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ABSTRACT

The first of a five part report on determining the least restrictive environment (LRE) placement of handicapped children summarizes findings from Annual Program Plans from 49 states and the District of Columbia for fiscal year 1978. The four purposes of the study were to obtain an overview of state policies regarding placement and related issues, to examine common policies and ambiguous areas of concern, to identify exemplary practices, and to consider reasons for variations in state policies. Among major findings are that generally, states provided little information on LRE, and where information was found it was equated with mainstreaming; the relationship between the individualized education program and placement was often unclear; and state plans varied greatly in defining steps and timeliness for the placement process. The second part of the document is devoted to a discussion of mainstreaming and LRE, placement meetings, level of specificity (handicapping condition), and sequence of meetings. Nearly half of the document is composed of appended material, including the content analysis form and classification criteria. (CL)

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STUDY FOR DETERMINING THE LEAST RESTRICTIVE ENVIRONMENT (LRE) PLACEMENT OF HANDICAPPED CHILDREN

Final Report:

Content Analysis of State Annual Program Plans

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INTRODUCTION

Highlights of Findings

In brief, the overall purpose of this study was to analyze State policies and procedures concerned with placement of handicapped children. Content analysis techniques were used to extract and quantify information from Fiscal Year 1978 State Annual Program Plans. The major findings from this activity are summarized below.

1. In general, the States provided little information on least restrictive environment (LRE). Where information was found, LRE appeared to be equated with mainstreaming.

Although many States presented very detailed information on placement, specificity with regard to LRE was rarely found. Most States cited LRE policy statements, but these were generally verbatim transcriptions from P.L. 94-142 ("to the maximum extent appropriate..."). A few States, however, did provide LRE policy statements that expanded upon the Law and others also furnished definitions of LRE. In defining LRE, mainstreaming was usually equated with the concept of least restrictiveness. There were some indications, however, that the confusion between mainstreaming and LRE may be diminishing. Several States expressed concern over de facto placement in regular classes, stressing instead the individualized nature of each placement and deemphasizing the specific service patterns.

2. State plans varied greatly in defining steps for the placement process, and in the maximum time allowed between those steps.

States showed considerable differences in the way placement steps were divided and defined. For example, "assessment" may be counted from the time the child begins testing or from the time all results are in. Some States may give time spans for initial placement while others for only the placement meeting. Thus determining how long the placement process can take was often obscured by highly variable and incompatible reporting approaches among States.

3. The relationship between the Individualized Educational Plan (IEP) and placement was often unclear.

Many States appeared to imply that the placement decision was made during the IEP meeting. Some indicated that the IEP was developed first and then placement determined; other States reversed this sequence. A third group of States gave no clear indication when the actual placement decision should occur. Confusion in this area may be due to the apparently contradictory requirements of P.L. 94-142 that the IEP contain "a statement of the specific special education and related services to be provided to the child" (121a.346(c)[1/]) (implying a placement decision before the IEP) and that placement "is based on his or her individualized education program" (121a.552(2)[1/])" (implying a placement decision after the IEP).

4. Many States provided detailed guidance in the form of administrative manuals for determining placement.

Administrative manuals were frequently the richest source of information concerning a State's placement procedures. Typically, such documents included information on eligibility requirements, definitions of handicapping conditions, recommended tests, suggestions for appropriate placement options, and facilities requirements. The existence of these documents would indicate that the States are providing extensive guidance in these areas of placement determination.

[1/] Federal Register, August, 23, 1977, Part II "Rules and Regulations for the Implementation of Part B of the Education of the Handicapped Act."

5. State policies were vague concerning parental participation, especially in the area of parental consent for placement.

Although a number of States specified parents as participants at the placement meeting, many others implicitly excluded parents from the actual decision-making process. Instead, parents were provided an informal conference to explain the placement decision, or were notified of the decision after the fact, or had to request a conference on their own initiative. Parental consent for placement was not clearly specified in several of the States. Parents could indicate "satisfaction" or "dissatisfaction." Failure of parents to respond within a specified period of time was sometimes construed as consent.

6. The States strongly emphasized regular class placement and the provision of a continuum of services.

A great many States indicated a strong preference for regular class placement and indicated that this environment should be considered first when determining placement. Most States specifically advocated the provision of a continuum and required assurances from their LEAs that a wide range of options was being provided.

7. The major constraints in meeting LRE requirements were lack of qualified staff, lack of options, and lack of funds.

Many States indicated that they did not have enough qualified staff to provide appropriate services to handicapped children. Insufficient training of regular education teachers to deal with handicapped students in the classroom was a related concern in this area. Many States indicated a shortage of options for low incidence handicapping conditions. This problem was especially severe in rural, low density population areas. Budget limitations were the third most frequently mentioned constraint; this lack of funding was often an underlying factor in the lack of staff and placement options.

8. The States have developed a number of creative strategies to facilitate placement of handicapped children.

Many specific and practical approaches for meeting placement related aspects of the Law were found in the States' Annual Program Plans

(APPs). State guidelines covered such areas as: standards for use of tests not given in English (norming samples, translations alone disallowed, etc.); detailed procedures for reintegration of handicapped children in regular classrooms (including simulating regular class environments, observations by the regular teacher of the child in his/her current class); provision of child advocates when parents are unable to attend meetings; listing of rejected placement options to guide subsequent decision-making in the event that the option selected becomes inappropriate; and the development of continuums with wider ranges of placement alternatives.

The remainder of this chapter will discuss the study objectives, the research questions to be answered, and the relationship between this study component and two other related activities being conducted as part of one overall project.

Purpose of the Study

Implementation of P.L. 94-142, the Education for All Handicapped Children Act of 1975, is not or should not be carried out in a vacuum. Although it is at the local level that the direct effects of the Act are seen, it is the responsibility of State level personnel to monitor and provide guidance in implementation of the Act. For this reason an examination of State policies and procedures affecting handicapped children is necessary to understand fully the context in which P.L. 94-142 operates.

One key aspect of this complex and comprehensive law involves the procedures for determining placement of handicapped children. A variety of factors may enter into the placement decision, but one main concern is that the least restrictive environment (LRE) be selected for each child. Thus, placement and LRE are intertwined, but not interchangeable terms. The LRE provision of P.L. 94-142 specifies that:

> ... to the maximum extent appropriate, handicapped children ... are educated with children who are not handicapped and that ... removal of handicapped children from the regular educational environment occurs only when the nature or severity of the

handicap is such that education in regular classes with the use of supplementary aides and services cannot be achieved satisfactorily.[1/]

Furthermore, Federal guidelines indicate that placement should be determined annually, be based on the Individualized Educational Plan (IEP) and be as close as possible to the child's home. The quality of services and potentially harmful effects should also be considered when determining placement.

Thus, at the Federal level, some guidance concerning placement is given. Federal requirements, however, are often not detailed to provide for flexibility in implementation. At this juncture the responsibility falls to the States--both to establish Federally required procedures and to supplement or clarify the other aspects of placement determination which they feel warrent attention. Finally, just as States are monitored at the Federal level to ensure that they have established required procedures, so too the States must ensure that their standards are being followed at the local level--where the actual determination of placement is made.

It is the goal of this study, then, to ascertain what steps have been taken at the State level to ensure implementation of the LRE placement of handicapped children. The specific purposes of this examination may be summed up as follows:

- to obtain a general overview of the range and specificity with which States address placement and related issues;
- to highlight common features of State placement policies as well as frequently overlooked or ambiguous areas of concern;
- to identify unusual or exemplary practices which aid in operationalizing placement related aspects of the Law; and
- to explore factors which may explain differences in the kind and extent of guidance concerning placement which States provide.

To address these broad areas of investigation, specific research questions were developed which guided the subsequent tasks of instrument

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[1/]The Section 612(5)(B) of Part B of the Education of the Handicapped Act as amended by P.L. 94-142.

creation, data collection, and analysis. These questions were drawn from a variety of sources, but were most heavily influenced by Federal regulations and the opinions of special education experts. These general study questions to be answered are as follows:

1. What kinds of policies do States have concerning placement of handicapped children and the least restrictive environment?

2. What formalized procedures do States present concerning the placement process?

3. What information do States stipulate should be shared when determining placement?

4. How do States operationalize the continuum of placement alternatives concept and assist LEAs in selecting from those alternatives?

5. Do States provide other guidelines for determining placement?

6. What additional requirements concerning the placement decision do States present?

7. What ancillary activities (such as training and monitoring) have States engaged in to facilitate placement decision-making?

8. What constraints have States encountered in implementing LRE?

These same research questions provided the basis for investigating two other contexts in which LRE placement must be examined for a full understanding of its implications: at the local (actual implementation) level and at the legal (interpretation) level. The State, local, and legal investigations were conducted as separate study activities, but were united in their focus on a common set of research questions concerning placement determination.

The analysis of State guidance concerning placement decision-making will provide a backdrop against which actual implementation at the local level (through observations of placement team meetings) can be viewed. Thus, what the States may recommend concerning, for example, the participants at a placement meeting, could be compared to those persons actually observed in attendance. Conversely, areas in which the States give little or no guidance can be examined at the local level to determine if local policies are filling the void or if local procedures reflect a similar lack of standardization.

The legal analysis of court and administrative decisions concerned with placement is related to the State analysis both conceptually and methodologically. These two activities employed variations of a content analysis approach to data collection. That is, documents were read and information abstracted in a quantifiable manner. Furthermore, the legal analysis will give some indication of how the courts and administrative officials interpret and/or redirect those same State level policies, which in turn will influence local implementation.

In the remaining chapters of this report, the methodology used to abstract information on placement guidelines promoted by the States is discussed (Chapter 2). This overview explains the process of content analysis, how the analysis form was developed, the manner and content of the analysis, and the cautions and limitations of the data. The next chapter presents our findings (Chapter 3). First, the overall results are given, then an in-depth discussion of the more interesting results, grouped by issue areas (e.g., LRE, Placement Meetings, etc.) is presented. Finally, a summary and our conclusions are given in the last chapter (Chapter 4). Throughout this report, specific examples drawn from the APPs are given. Where a particular strategy or approach appears to be unusual or noteworthy, the state is identified by name. Appended to this document are the content analysis form and classification criteria used during data collection and frequency tables displaying all the data.

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METHODOLOGY

Each year, the States are required by Law to submit an Annual Program Plan (APP) to the Bureau of Education for the Handicapped (BEH) in order to be approved for funding. This Annual Program Plan must contain a variety of assurances and information concerning the State's implementation of P.L. 94-142. To supplement and verify their report, many States append supporting documents to their Plans, such as administrative manuals, legislation, regulations, monitoring forms, etc. Thus, the APP is often one of the most comprehensive compilations of State level data concerned with handicapped children. For this reason, the APP was chosen as the body of information to be analyzed to determine the extent of State guidance in the implementation of LRE. Annual Program Plans for Fiscal Year 1978 were analyzed for all 49 States (New Mexico is non-participating) and the District of Columbia.[1/]

Content analysis was used to abstract and quantify the data. In brief, content analysis involves developing theoretically relevant categories and then classifying the content according to those categories. To help ensure objectivity, two analysts individually read and coded the

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1/ Every attempt to secure final and approved FY '78 APPs was made. Although draft APPs were not used for content analysis, it was difficult to discern whether the APPs were actually in final form. Matching revised APPs to their approved version to identify any differences was beyond the scope of this study. Some States, therefore, may have made final changes which were not captured during analysis.

information for each Plan, then met to synthesize their findings. The results from the synthesis forms were then tallied, and presented as our final results.

Instrument Development

The key to accurate content analysis is the category and classification system. The initial content categories were developed after reading sample APPs to determine the range and types of information found in them. A number of categories were based on information which the States were requested to include in their APPs (e.g., parent consent for evaluation, non-discriminatory testing, etc.). Other categories were developed to complete the examination of study issues. The draft analysis form was then reviewed and further refined.

Accompanying the analysis form was a manual specifying the classification criteria. This document contained detailed guidelines for determining the proper assignment of content. For each category, the area in question was explained, examples of responses fitting the category were given, and the boundaries between classifications were delineated. The final version of the content analysis form and the accompanying classification criteria may be found in Appendix A.

Format Considerations

Due to the massive amounts of information that could potentially be contained in the APPs — much of it irrelevant to the study -- some systematic way of narrowing the field of inquiry had to be determined. First, only those parts of the APP identified as pertinent to the study were analyzed. A prespecified sequence for reading each section and each supporting document was also adopted to further systematize the analysis. Thus, each APP was reviewed in the following order:

1. Least Restrictive Environment Section
2. Individualized Education Plan Section
3. Participation of Private School Children Section
4. Placement in Private Schools Section
5. Annual Evaluation Section

6. Child Identification Section
7. Protection in Evaluation Procedures Section
8. Procedural Safeguards Section[1/]
9. State Regulations, if appended
10. Administrative Handbook Sections, if appended
11. Training Manuals, if appended
12. Monitoring Instruments, if appended
13. Other Relevant documents, if appended

The original approach had been to continue reading documents until the designated coding categories were complete. This did not prove to be feasible, however, since no State ever addressed all of the points of interest in the study. Therefore, the analysts reviewed the designated documents in the order specified and then skimmed all remaining materials for relevance. If additional information was found through this approach, then the appropriate categories were filled out.

Acquiring all the supporting documents to the APP was not always possible. Many States listed documents that were only available upon request. Time and cost considerations prohibited pursuing these. Furthermore, since the APPs under review were a year old,[2/] some of the supporting documents were no longer available. This was unfortunate, since it became apparent that the APP itself was often not as informative as the accompanying materials. Every effort was made to acquire these materials, however, and in this endeavor the State Plans Officers at the Bureau of Education for the Handicapped proved to be most helpful.

These difficulties in acquiring fugitive documents should be kept in mind when reading the results. We did not attempt (nor would it have been possible) to obtain <u>all</u> information related to the education of handicapped children for each State. We did make every reasonable effort

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1/ This section was added to the sequence later, when it became apparent that relevant information was routinely located here.

2/ It was not feasible to use FY '79 plans as at the time this study effort was initiated, many State Plans were still undergoing Bureau review and/or State revision; others had not yet been submitted.

to acquire those documents which a State indicated were supplementary to the APP. In other words, if a State did not list their administrative manual, for example, as an appendix or attachment to the APP, then we did not try to obtain it for analysis. The results presented in this report, therefore, cannot be considered exhaustive or definitive; rather, they are descriptive of that body of information which the State has furnished the Bureau of Education for the Handicapped.

Content Considerations

It is the nature of content analysis that only explicit references should be used in determining the inclusion or exclusion of content into categories. This conservative approach is necessary if any consistency or objectivity is to be maintained. Therefore, ambiguous statements or content requiring inferences to be made before assignment to categories should be eliminated from analysis. Only the concrete and explicit statement can be classified with any accuracy. Therefore, the approach throughout the analysis was one of judicious prudence.

The extent to which this caution would have to be exercised, however, was not anticipated. The APPs, as it turned out, were highly discrepant in the precision with which they were written. Rather than lose too much information due to insufficient clarity for coding, some categories were supplemented by an "implied" or "other" response option. In this way, areas where the States were unclear, could also be identified.

A similar difficulty involving the content of the APPs was the existence of contradictory statements. Although at first these contradictions may seem unexpected, given the variety of materials and the time span over which they would have been composed, such occurrences are understandable. Two approaches were taken to deal with this problem; the technique used was determined by the probable cause of the discrepancy. If differences were due to the inclusion of outdated materials, the most recent information was analyzed. If, however, the recency of the documents could not be determined, or if the discrepancy was not caused by old information, a notation summarizing the contradiction was made and both statements recorded.

The converse of the outdated information problem was also encountered during analysis; i.e., some States referenced "proposed" guidelines or changes, rather than actual and official information. These policies/procedures were not formally adopted at the time the APP was written and, presumably, might not ever have been. Since it would have been impossible to ever obtain completely current information, or ascertain if what was proposed was actually accepted, those statements of "proposed" action were reviewed as if they were official.

A final consideration concerning the content of the APPs is that of omitted information. Because project staff did not acquire and read all materials for each State, the absence of reported information does not necessarily mean that States do not have policies or guidelines in that area. For this reason, the reported results include the option "no mention", so that lack of reported information will not be misconstrued as absolute absence of State guidance. Considering the volume of information analyzed for each State, it is unlikely but possible that a State could have written guidelines concerning a particular area of investigation that were not available to the content analysts.

Cautions In Interpreting the Data

As discussed earlier, all materials containing placement information of a State may not have been included in the content analysis. Therefore, the results should be viewed as a comprehensive description, but not a definitive reporting, of State leadership in placement determination. Furthermore, it was beyond the scope of this report to verify whether the States' guidelines were actually in practice at the local level. We could only summarize what the States had, in writing, described as their recommended procedures concerning placement.

It should also be noted that our results derived from the 1978 APPs. A brief look at some of the Fiscal Year 1979 APPs indicates that some States have added substantial information to their approach to placement decision-making. We fully recognize that changes may have been made in the States since their '78 Plan. Our information, therefore, is not necessarily the most up-to-date for those States initiating substantial revisions since their '78 APPs were submitted.

Finally, the extensive scope of our inquiry should be taken into consideration when interpreting the non-response of States. In many cases we were looking for highly detailed, specific information not required to be contained in the APPs. Thus, the lack of response on these items by some States should not be interpreted as non-compliance or inadequate guidance. Depending on State laws and histories, variation in the extent of control or assistance is to be expected. In addition, the purpose of the content analysis was <u>not</u> to verify whether the States included all required information in their APPs. We were simply interested in determining what information does exist at the State level and the APPs provided the most comprehensive compilation for our purposes.

3

FINDINGS

This chapter consists of two main sections; the first is a narrative summary of our overall findings. For each major study question, the results of the content analysis will be presented. This narrative summary will highlight general trends and expand upon some of the information given. Where the findings are lengthy or interesting, the corresponding frequency table will be given. A complete set of tables can be found in Appendix B. The second section contains more detailed analyses of selected issue areas. The areas to be examined were determined by the study emphases and by those questions resulting in interesting or unusual findings. This latter section will present a more in-depth investigation of those issues.

Throughout the text, numbers in parentheses indicate the actual number of states responding in the manner described. Where percentages also appear, they are based on a total N of 50. In many instances, multiple responses were allowed so the percentages do not sum to 100. Where this occurs in the tables, the item has been marked, labeled as a "frequency," and no total column appears.

SECTION 1: GENERAL FINDINGS

Research Question 1: What kinds of policies do States have concerning placement of handicapped children and LRE?

To determine the extent to which States provided general policy guidelines concerning placement and LRE, several areas were investigated: the existence of State LRE policy statements; whether

States required LRE policy statements from their LEAs; if States supplied a definition of LRE; and if a sequence of steps in the placement process was specified by the States.

LRE Policies

Slightly more than three-fourths of the States (39) had policy statements addressing, in some form, LRE.[1/] For the most part, these statements were identical to or paraphrases of the Law ("to the maximum extent appropriate"). More than half of all the States (29) cited an LRE policy statement that was similar to the Federal policy.

A smaller group of States (8) cited policies that expanded upon the Law. For example, one State went on to address the benefits of mainstreaming. Another placed special emphasis on facilities, requiring all special education classes to be housed with regular education classes. As an example of a statement expanding upon the Law, North Carolina's policy is cited below:

> It is recognized that children have a variety of characteristics and needs, all of which must be considered if the potential of each child is to be realized; that in order to accomplish this the State must develop a full range of services and educational programs, and that a program must actually benefit a child or be designed to benefit a particular child in order to provide such child with appropriate education and service opportunities. The General Assembly requires that all programs employ least restrictive alternatives.

Two States alluded to State policies, but did not explain what the policy consisted of; one other State addressed LRE-related issues as part of the assurances required in interagency agreements, but no direct relationship between this and State policy was drawn.

Very few States (14) indicated that they required their LEAs to also have a policy statement on LRE and fewer still (3) said that this was recommended. More than half of the States (28) made no mention of whether their LEAs were to have LRE statements of their own.

1/A policy statement addressing a handicapped child's right to a free appropriate public education is required by BEH to be contained in each State's APP. This does not necessarily mean that that statement will encompass LRE.

LRE Definitions

Forty percent of the States (20) provided a definition of LRE. For the most part, the States seemed to equate LRE with mainstreaming: slightly more than one-fourth of the States (13) used mainstreaming in an explanation of LRE. These States indicated that LRE meant "education with non-handicapped students" or that it was "the best education at the least distance from the mainstream of their peers." Thus, interaction/integration with non-handicapped students was the most frequent definition of LRE. Normalization and the most "appropriate" placement were also mentioned in several State definitions.

Placement Sequence

The sequence of steps in the placement process was also an area of investigation. Specifically, we were looking for flow charts or some other manner in which the States summarized all the necessary activities from referral to placement. Less than half of the States (22) specified their steps in the placement process and these descriptions showed marked variability in placement procedures. Exhibit 1 illustrates this point with two examples of flow charts. Georgia's sequence shows three different junctures at which parent permission must be secured: evaluation, placement, and the IEP. Georgia's flow chart also clearly shows the relationship of the IEP to placement, indicating that general goals are to be developed and, after placement, the short term goals are specified. Michigan, on the other hand, included a more succinct flow chart, but delineated the time lapses between each step.

In summary, then, most States cited placement policies which, in some way, addressed LRE. The majority of these policy statements were paraphrases of the Law, although a few States expanded upon this model. Definitions of LRE were also provided by several States; most of these indicated that mainstreaming - placing children in environments where they can interact with non-handicapped students - was viewed as synonymous with LRE. State direction concerning the sequence of steps in the placement process was specified in less than half of the APPs.

EXHIBIT 1: SAMPLE FLOW CHARTS OF THE PLACEMENT PROCESS

Flow Chart from Georgia

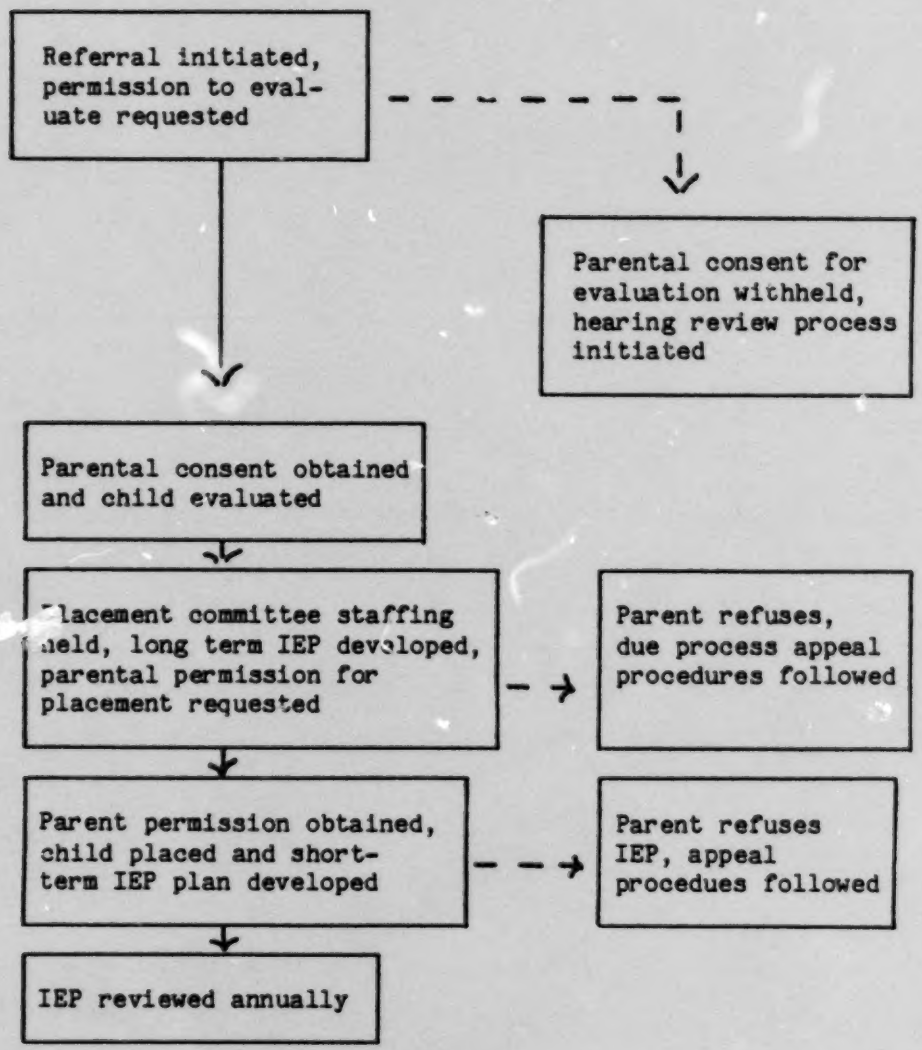
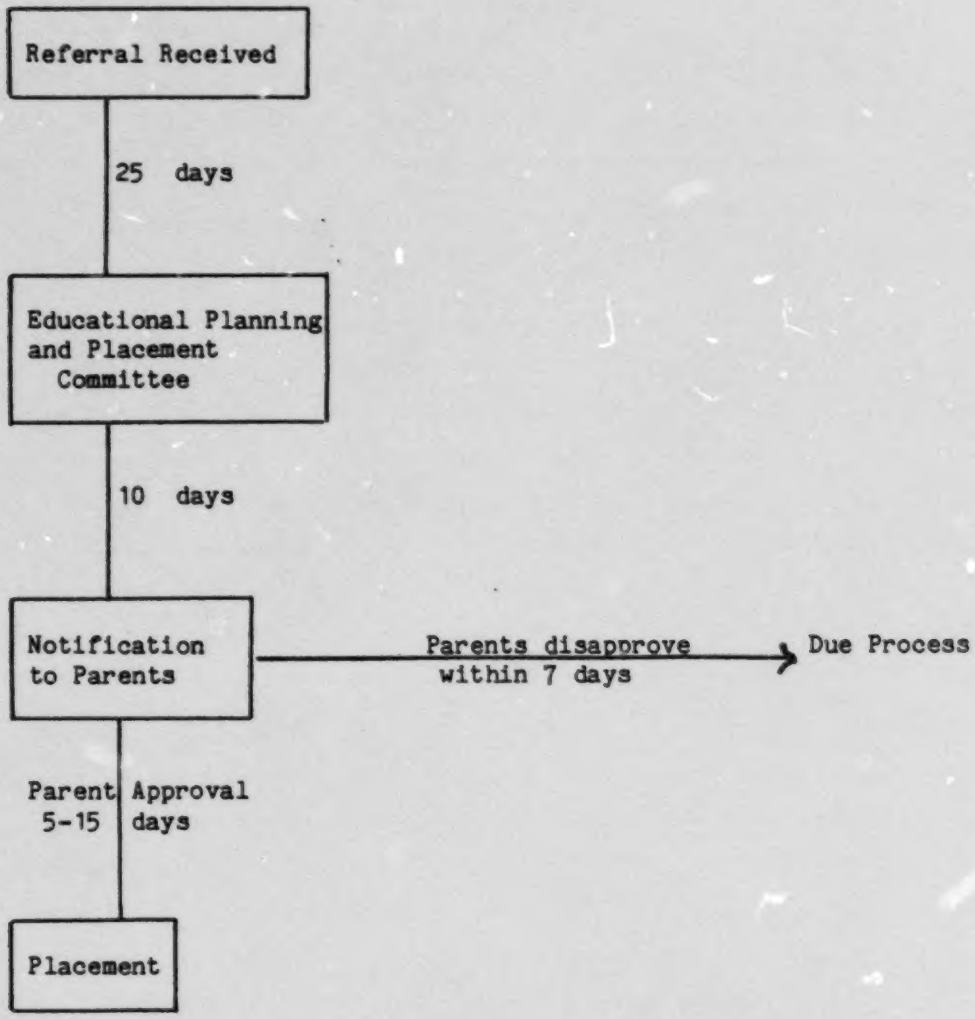

Referral initiated, permission to evaluate requested
Parental consent for evaluation withheld, hearing review process initiated
Parental consent obtained and child evaluated
Placement committee staffing held, long term IEP developed, parental permission for placement requested
Parent refuses, due process appeal procedures followed
Parent permission obtained, child placed and short-term IEP plan developed
Parent refuses IEP, appeal procedues followed
IEP reviewed annually

EXHIbIT 1: (Continued)

FLOW CHART FROM MICHIGAN



Research Question 2: What formalized procedures do States present concerning the placement process?

The number, name(s), and sequence of placement meetings were examined to determine how specific the States were (or could be) in this area. The time lapses allowed between each step in the placement process were also noted as well as the meeting participants specified by the States. Finally, State procedures concerning placement evaluations, responsibility for final placement decision, and other, miscellaneous procedures were examined.

Placement Meetings

Very few States indicated how many meetings or in what order those meetings were to take place. Only 2 States indicated the number of meetings (in both cases two meetings were mentioned) and only 4 States indicated that the number of meetings varied. The remaining States made no mention of how many placement meetings were held. It appears that the determining factor in the number of meetings is the case itself. More complex or controversial cases may require several meetings, while others may be completed quickly in one session. This may be the reason that so many States did not address this issue.

More States indicated some sequence to be followed in the placement decision-making process (13). For the most part, the States described this process as the placement team making a recommendation to the Superintendent or the Director of Special Education, who then becomes responsible for the final decision. One State had a slightly more elaborate process wherein the staff makes a recommendation to the principal (within 10 days); the principal, in turn, recommends placement to the district superintendent (within 10 days); the district superintendent decides upon the action to be taken on the principal's recommendation and notifies the principal. A conference with the parents is then held (within 10 days).

Great variability among States was shown in the actual name of the placement meeting. The range and variety of these meeting titles, not to mention the broad functional scope they indicate, provided a clue to the

ambiguity surrounding the actual placement meeting. Two States did not supply a meeting title, others mentioned several names. Thus, a total of 62 different names of meetings concerned with placement were identified. Fourteen of these contained the word "placement" in them. Another 9 to 10 were nominally associated with evaluation as were 6 with the ambiguous term "planning." Several meetings (6) were labeled "multidisciplinary" with little else to indicate the function of the conference. Similarly, "child study teams" were listed in 7 instances and "staffing teams" in 5 others. In 5 cases, the State indicated that the IEP Committee was involved in placement. The remaining meeting titles involved "admissions" (4) or other, miscellaneous functions such as screening, local surveys (5). Thus, in only rare instances did the title of a meeting clearly indicate that the function to be performed was placement.

Minimum time spans between steps in the placement process also showed the high variability among States (see Table 1). For example, the time lapse between assessment to the placement meeting ranged from 5 days to 90 days (although presumably the States meant two different periods by this: from completion of assessment (5 days) versus from the beginning of the assessment process (90 days)). Similarly, from the placement meeting to initial placement a range of 15 to 60 days was found among the States.

One obviously complicating factor in determining the general time intervals of States was the variation in the way States divided the placement sequence and assigned time allowances to different junctures in the process. Thus, one State gave time intervals from referral to assessment, another from referral to when assessment results are sent to parents.

Placement Team Participants

Three general types of placement team members were frequently mentioned in State Plans: a representative of the school administration (44); a representative of the teaching staff (generally described as the child's current teacher) (44); and the parents (39). These three types of members are also required to participate in the IEP conference. In

TABLE 1: TIME LAPSE BETWEEN STEPS IN THE PLACEMENT PROCESS

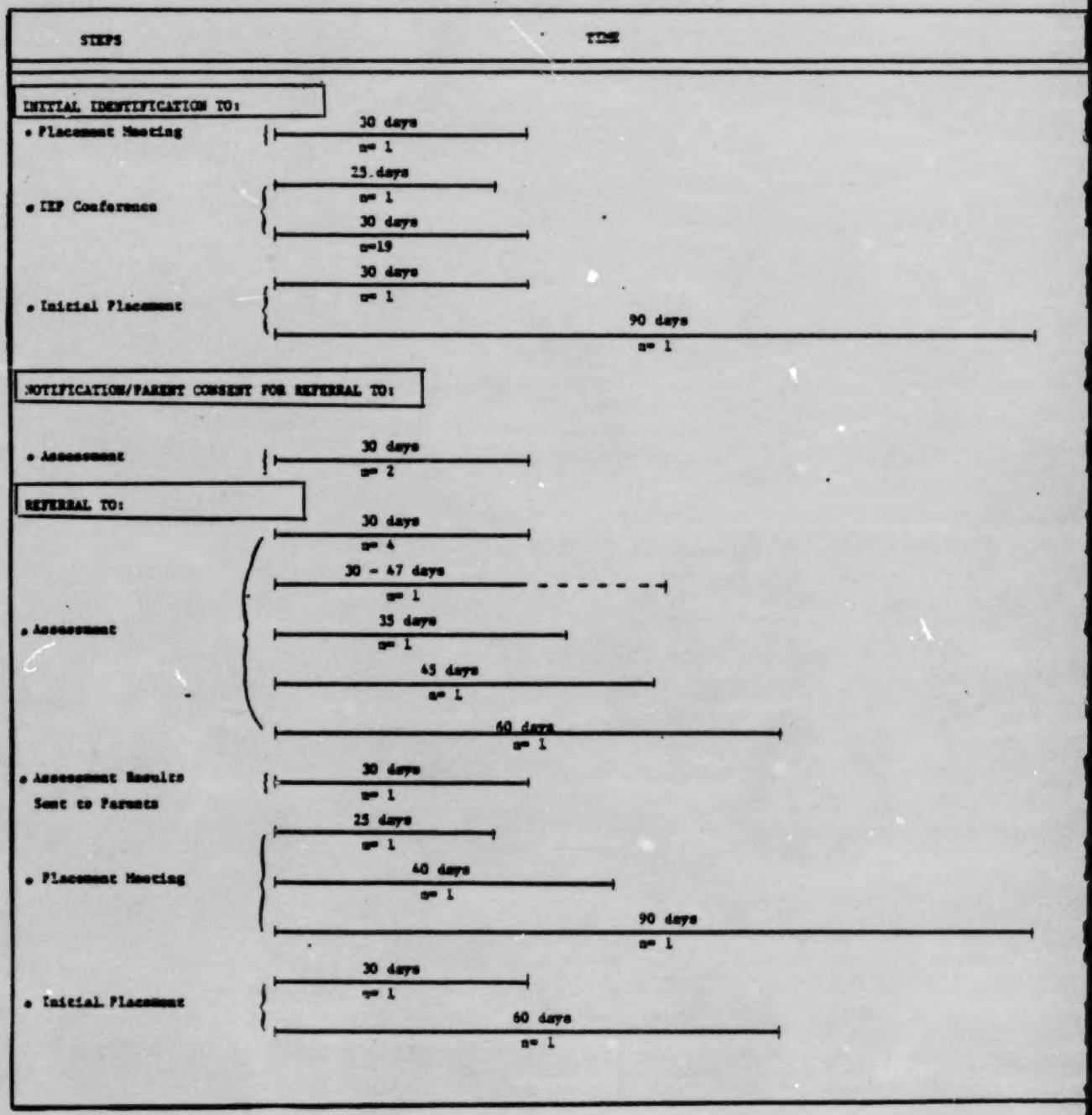
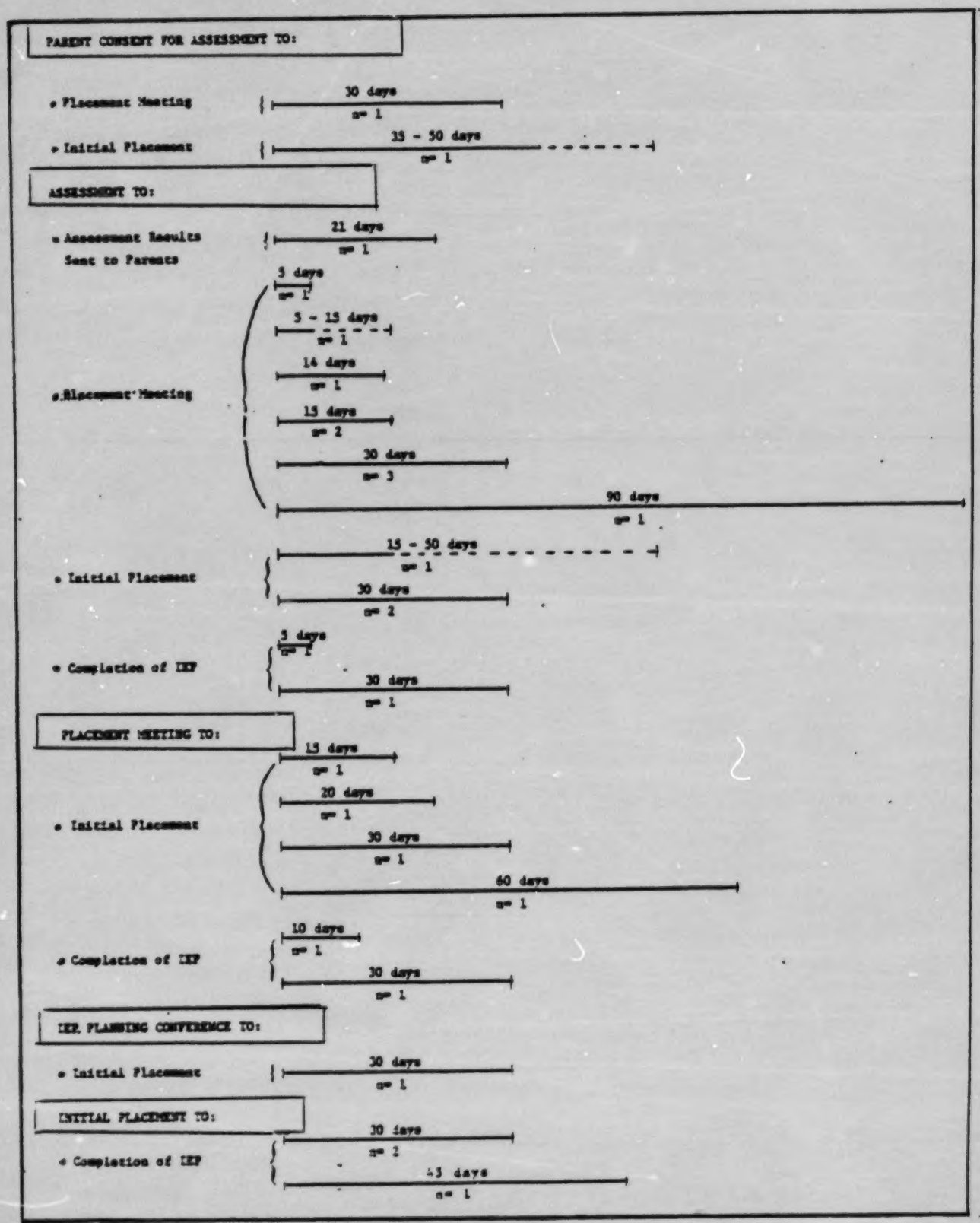


TABLE 1: (Continued)



part, this similarity in participant types may reflect common sense: administrators, teachers, and parents are the logical choices for both types of meetings. The States may also have followed the lead of the Federal requirements for IEP participants when specifying placement team members. Finally, the similiarity in participant types may also be a reflection of dual purpose meetings/composition; i.e., the IEP and placement are done in the same meeting or are to be done by the same people.

The diagnostician and the child were also mentioned as participants in over half the States (29 for both). Although the child was listed as a participant by 29 states, only 5 States elaborated on when the child would be an appropriate member. For example, Massachusettes indicated that the child should attend at his or her request. Missouri stated that child attendance is decided by mutal agreement between the parents and agency. California includes children "if they are capable of benefitting from the discussion." A nurse and social worker were also listed by States as occasional placement team members (16 for both). Table 2 shows the results of the content analysis on this item.

A subcategory of investigation was directed toward the specific types of administrators/teachers which were listed. To read Table 2 appropriately, one must keep in mind that when a specific administrator, for example, was mentioned, the title given was marked (e.g, director of special education) as was the general category of "administration". Because some states specified both the principal and the director of special education, the frequencies in these columns were not summed, as they would be double counts. The director of special education was specified somewhat more frequently than the building principal (44.0%; n = 22 versus 30.0%, n = 15, respectively), but neither administrator was named as often as regular and special education teachers (both listed by half of the States).

The response option "other" in this table includes some specific participants, e.g., counselor and vocational educator. This response category shows such a large number of responses (44) primarily because it

TABLE 2: PLACEMENT TEAM PARTICIPANTS

Type		Frequency*
1.	Administration (Specified and Unspecified)	88.0 (n=44)
	Specified Administrators	Frequency*
	• Building Principal	30.0 (n=15)
	• Director of Special Education	44.0 (n=22)
2.	Teacher (Specified and Unspecified)	88.0 (n=44)
	Specified Teachers	Frequency*
	• Regular Education	50.0 (n=25)
	• Special Education	50.0 (n=25)
3.	Diagnostician	58.0 (n=29)
4.	Nurse	32.0 (n=16)
5.	Child, if Appropriate	58.0 (n=29)
6.	Parents	78.0 (n=39)
7.	Social Worker	32.0 (n=16)
8.	Other	88.0 (n=44)
9.	No Participants Specified	8.0 (n= 4)

*Multiple responses were allowed.

encompassed the listing by States of: "others, at the discretion of the parent or staff." Only 4 States gave no apparent guidelines concerning placement team participants.

Parent Participation

Another subcategory of investigation was the policy of the States concerning parental attendance at the placement meeting. This topic proved to be one of the most difficult to analyze. Only 6 States gave a clear indication that parents must attend the placement meeting. Parental attendance did not appear to be required in 20 States; another 13 States had unclear policies; and for the remaining 11 States the parent was not specified in any capacity as a placement team member. (The related issues of parent notification and consent are discussed under Research Question #3.)

The manner in which the States addressed the issue of parent participation in placement meetings was interesting in its variety. In some States, the parents were procedurally removed from the official decision-making, for example: "The parent has an opportunity to participate in an informal placement conference prior to implementation of the proposed action "(emphasis added). Similarly, another State had an "interpretive conference" in which "one of the LEA staff meets with the parent to explain the decision." Others left it up to the parent who, "upon request (is) given an opportunity for a case conference about placement."

One State made a distinction on the basis of handicapping condition: "except for the speech impaired child, parents must always be invited." Finally, only one State described provisions to ensure parent and child protection. In this State, if a parent could not attend the meeting "a pupil services worker in the district, but not supervised by the principal,... attends as a child advocate."

The APPs were also reviewed to gain an indication of placement team composition, i.e., if the team was to be interdisciplinary and what criteria for participation were required. Although most States specified

that the team involved in evaluation of a child should be inter-disciplinary, few indicated this to be the case for the placement team (16). Four other States indicated interdisciplinary team composition by implication only. Other criteria for placement team membership included: knowledge of child (29), knowledge of options (24), knowledge of handicapping condition under consideration (8); and other (meaning of evaluation results, knowledge of personnel, and same racial group as child) (33).

Other Placement Procedures

All States reported that they required an evaluation of placement. The majority of these indicated that the evaluation was to be conducted annually (43). Some States, however, reported more rigorous placement evaluation procedures which occured more frequently than the Law requires. Three States reported semi-annual reviews and four other States conducted evaluations more frequently than semi-annually. Arkansas and Oklahoma reported continual monitoring/review; Texas indicated informal evaluations of placement every three months and a formal review once each year; and Kansas reported evaluation of placement every 12 weeks.

Table 3 shows other, miscellaneous, procedures which the States addressed in their APPs. Of those investigated, activities surrounding parent involvement were reported most frequently. More than half of the States (29) indicated procedures to accommodate the parent (such as bilingual services, transportation) and to encourage parent participation (15). Less frequently mentioned were procedures to assist the LEAs (3) and to ensure mainstreaming in extracurricular activities (1).

Determining who was actually responsible for the final placement decision when a child was placed in other than the home school (e.g., private school/state institution within the LEA or any placement outside the LEA) was difficult. In general, the home LEA appeared to be the responsible entity, regardless of the placement location (within the LEA's jurisdiction (42 States); outside the LEA's jurisdiction (38 States)). The precision with which this responsibility was reported,

TABLE 3: MISCELLANEOUS PROCEDURES

Specific Procedures	Frequency*
1. Encouraging Parent Participation	30.0 (n=15)
2. Ensuring Informed Consent	26.0 (n=13)
3. Accomodating Parent (Bilingual Services, etc.)	58.0 (n=29)
4. Standardizing Decision Process (Checklists, etc.)	14.0 (n= 7)
5. Assisting LEAs	6.0 (n= 3)
6. Ensuring Mainstreaming In Extracurricular Activities	2.0 (n= 1)
7. Other	4.0 (n= 2)

*Multiple responses were allowed.

however, leaves some doubt as to its actual nature. Most States indicated that LEAs maintained "administrative control and direction" and were ultimately responsible for IEP development, with the "option to delegate this responsibility to the receiving institution." Whether the responsible party was clearly known, therefore, may be questionable.

To summarize, the States exhibited great variability in the names of placement meetings and the time lapses allowed between steps in the placement process. The States were very similar, however, in the types of placement team participants specified (administrators, teachers, and parents). Although parents were frequently listed as placement team members, the extent of their involvement in the actual decision-making was not clear. In some instances parents were procedurally removed from this aspect of placement determination (e.g., they received an informal meeting with a district staff member who explained the results of the meeting). That the parents themselves may be an obstacle to greater involvement may be indicated by the high frequency of parent-related activities mentioned by the States (to accomodate the parent and encourage parent participation). Although very little specific information was given on what these activities actually entailed, this may suggest that the States already recognize, and are attempting to remedy, the problems surrounding parent involvement.

Research Question 3: What information do States stipulate should be shared?

The general category of information sharing refers to the types of information which States indicated should be a part of the placement process: assessment data and safeguards, notification, consent, and other information for parents.

Evaluation Safeguards

Only 1 State did not mention its procedures for protection in evaluation. The remaining States provided a range of assurances, as Table 4 shows. The most frequently mentioned evaluation safeguard was that tests would be given in the child's native language (45). This was

TABLE 4: EVALUATION SAFEGUARDS

Safeguards		Percent of Total
1.	No Mention of Safeguards	2.0 (n= 1)
2.	Safeguards Mentioned	98.0 (n=49)
	Specific Safeguards	Frequency*
	• No Single Test	82.0 (n=41)
	• Given In Native Language	90.0 (n=45)
	• Non-Discriminatory Testing	84.0 (n=42)
	• Not Solely Intelligence	70.0 (n=35)
	• Tests Other Than Achievement	52.0 (n=26)
	• Other Safeguards Not Required by Law	6.0 (n= 3)
	TOTAL	100.0 (N=50)

*Multiple responses were allowed.

followed in frequency by a statement of non-discriminatory testing policy (42); that no single test would be the criteria for placement (41); and that evaluations would assess educational need and not solely provide an intelligence quotient (35).

Some States included other safeguards not required by the Law (3). For example, New Hampshire had strict procedures concerning non-discriminatory testing. In this State mere translations of tests were prohibited; evaluations had to be standardized in the native language. There also had to be a clear specification of the samples used for item validation and test standardization. The inclusion of a small number of minority members in the norming sample, the APP went on to say, did not make a test "fair." In addition, the child's performance on the tests should be related to specific group and general population norms, and references had to be clear and specific.

Besides evaluation safeguards, the types of assessment data to be used in determining eligibility/placement were also investigated. For most States, adaptive behavior ratings (36), cumulative records (36), and teacher reports (35) were the most often recommended sources of information.

All States indicated that they required written notice to the parents concerning placement (50). Some States also added that not only was notice of placement and/or change in placement required, but also notice of continuation of placement. No States mentioned any procedures for notification of others (staff, diagnostician, etc.).

Parental Consent

State requirements concerning parental consent were examined for four steps in the placement process: referral, evaluation, placement, and change in placement. Very few States mentioned any requirements concerning referrals (44 State Plans did not address this area) and no States required parental consent for referral. Six States, however, indicated that notice was provided to the parents concerning referral. Nearly all States (48) clearly indicated that parental consent was required for evaluation. For two States, however, the consent

requirements were not clear. One State reported that consent was "implicit", yet the State law referred only to "notice and participation." The other State required notification of evaluation, but unless the parents objected on a "response form", the assessment was done. This same State went on to add that if the parents objected and did not show up for the conciliation conference, the district would proceed with the action.

The problems with lack of clarity concerning "consent" became more evident in the area of placement. For 36 States consent for placement was indicated. With another 9 States, however, only notice was mentioned or "consent" was not clearly stated. Several States mentioned that parents could indicate their "satisfaction or dissatisfaction" with the placement or that notice was sent and the parents "may agree." Other States viewed failure of the parents to respond within a specified period of time (7-10 days) as "consent."

Finally, the consent requirements for change in placement were examined. Responses were fairly evenly distributed among those States requiring consent (15), those requiring notice (16), and those that did not address the issue (19).

Other Information Sharing

Another area of investigation under the category of information sharing was the information that was shared with the parent and if any other people were routinely supposed to receive information. All of the States indicated that parents were provided information on their rights and on due process proceedings and nearly all (42) reported that the results of assessments were to be shared with parents. A majority of states (35) also provided parents with a list/description of options. In addition, most States indicated that parents should be informed of the proposed action, reasons for the action, what options were rejected, and why.

In very few cases did the States designate other persons with whom information was to be shared. Four States (8.0%) specified that the receiving teacher should be informed of the assessment results and

general recommendations, including the child's strengths and weaknesses. Rhode Island went on to indicate that the receiving teacher should have an orientation to facilitate implementation of the IEP. This was accomplished through the teacher's participation in writing the Plan and in the staffing, as well as with any prescribed inservice.

The child was reported as an information recipient by slightly more than one-fourth of the States (13). This item was generally couched in the terms that the child, at the age of majority, was entitled to the same rights and to have access to the same information as the parents. Little additional information was added. Only two States specified others with whom information was to be shared: the receiving principal (Rhode Island) and anyone with parent consent (North Carolina).

In summary, most States reported a variety of evaluation safeguards to ensure non-discriminatory testing (and, subsequently, appropriate placement guided by those results). All States required parent notification of placement and nearly all clearly indicated parental consent for evaluation. In the area of consent for placement and change in placement, however, the States were considerably more vague. All of the States reported that parents were to be informed of their rights and the due process procedures; most States also mentioned sharing assessment results and a list of placement options with parents.

Research Question 4: How do States operationalize the continuum of placement alternatives concept and assist LEAs in selecting from those alternatives?

Several factors were investigated with regard to the States' approaches to placement options. The types and manner in which the States reported placement options (on the LRE table required in the APP) were reviewed, as well as definitions of options, State guidance in the order in which options should be considered, the extent and manner in which States advocated regular placement and the provision of a continuum, and if States mentioned the concept of a continuum within an option.

There were two ways in which the States could report child counts of placements in use: they could report total numbers of children in each

of four broad placement groupings (regular class, separate class, separate school facilities, and other educational environments) or breakdowns within those groupings could be given (e.g., regular class with indirect services, regular class with direct services, and regular class with services provided in a resource room). About half of the States used the former method and the other half, the latter. A few States mixed their manner of reporting; grouped data would be given, for example, in the category of separate class, but separate school facilities would be broken down so that counts for private day school, public, and private residential placements would be presented. Due to these inconsistencies in allowable reporting approaches, generalizable information from this table in the APP was limited, at best.

Placement Options

There was little variation in the frequency with which specific placement options were reported. Of those eleven options contained on the standard chart in the APP, private residential placement was reported less frequently (only 16 of the 50 States) than the others. Hospital programs and indirect services in the regular class were also reported less often (18 for each). The most frequently reported options were self-contained classes on a full time basis in a regular school (22) and public residential placement (22).

Similarly, when the States reported grouped data for the four broad placement categories, the fewest States presented information on separate school facilities (24) and other environments (25). Regular class (27) and self-contained (27) placements were reported more often. In addition to those standard placement options discussed above, several States listed alternative placements, e.g., cascade system (1), extended diagnostic placements (3), and other (group homes, vocational/adult education, etc.) (11).

Whether the States provided a definition of their placement options was also investigated. For only 14 States could no definition be found. Another 9 States gave descriptions of placement options similar to those outlined in the Federal regulations. Many States (15) used the same

basic placement groupings, but expanded upon the Federal definitions. The remaining States (12) grouped and defined their options in a manner different from the Federal approach. In the following exhibit an example of Missouri's presentation of placement options is given. It is interesting to note that Missouri has made some finer distinctions at the less restrictive end of the continuum (e.g., itinerant tutors, academic/non-academic instruction for self-contained placements). This continuum is also matched with severity levels and, as illustrated, those levels cut across certain placement alternatives, i.e., both mildly and moderately impaired students may be served in the resource environment.

Order of Consideration

Slightly more than half of the States (26) addressed the order in which options should be considered. When States provided specific guidance in this area, they expressed a strong preference for beginning with regular school options before considering more restrictive ones (18). No State indicated that solely special education environments should be considered first. A few States provided very specific information on the order in which various placement options should be considered, depending on the exceptionality of the child. One such example was Alabama, whose information on LRE alternatives and placement recommendations is summarized in Exhibit 3. With the exception of the severely/profoundly multiply handicapped, Alabama's recommended order of placements for all children begins with some regular class exposure.

Another approach to determining appropriate placement was provided by Arkansas. Similar to Alabama, the organization was categorical (i.e., for each handicapping condition). For Arkansas, however, four broad placement options were listed, with the determining factor being the severity of handicapping condition. Exhibit 4 summarizes this information.

Given these examples of placement guidelines and option considerations, it was not surprising that most States were found to either generally or specifically advocate regular class placement and the continuum of services. Preference for regular class placement was

EXHIBIT 2: CASCADE OF PLACEMENT OPTIONS (MISSOURI)

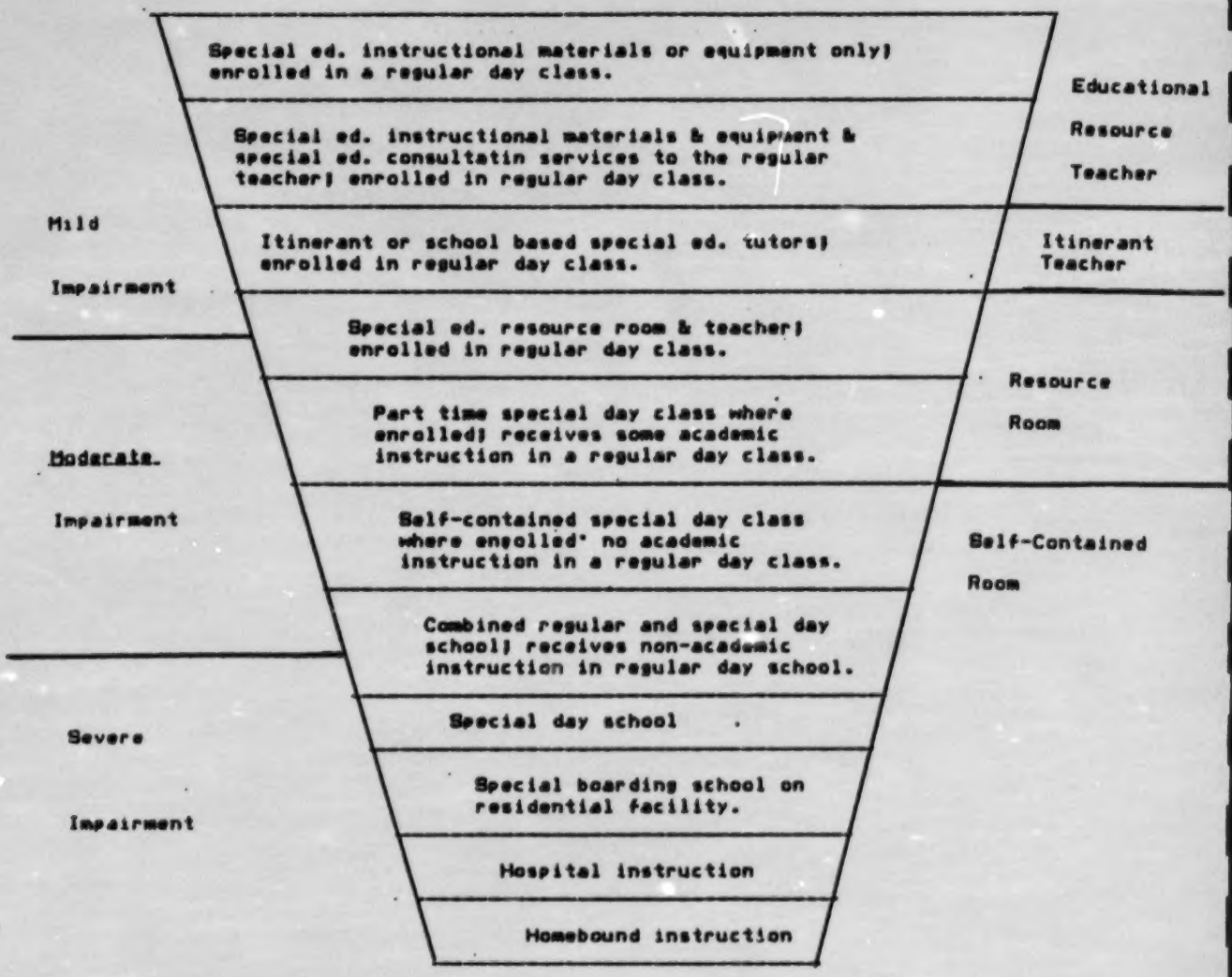

Special ed. instructional materials or equipment only; enrolled in a regular day class.
Special ed. instructional materials & equipment & special ed. consultatin services to the regular teacher; enrolled in regular day class.
Itinerant or school based special ed. tutors; enrolled in regular day class.
Special ed. resource room & teacher; enrolled in regular day class.
Part time special day class where enrolled; receives some academic instruction in a regular day class.
Self-contained special day class where enrolled; no academic instruction in a regular day class.
Combined regular and special day school; receives non-academic instruction in regular day school.
Special day school
Special boarding school on residential facility.
Hospital instruction
Homebound instruction
Educational Resource Teacher
Itinerant Teacher
Resource Room
Self-Contained Room
Mild Impairment
Moderate Impairment
Severe Impairment

EXHIBIT 3: RECOMMENDED ORDER OF CONSIDERATION OF PLACEMENT OPTIONS (ALABAMA)

Condition **	LRE Alternatives in Order of Consideration *							
	Regular Class -indirect	Regular Class -direct	Regular Class Resource Room	Self-Contained Part time	Self-Contained full time, regular school campus	Self-Contained full time day school	Public Residential School	Private Residential School
Specific Learning Disability		1	2	3				
Gifted and Talented	1	2	3					
Visually Handicapped	1	2	3	4	5	6	7	8
EMR		1	2	3	4			
TMR				1	2			
Severe/ Profoundly Multiply Handicapped					1	2 (public) 3 (private)	4	
Physically Handicapped	1	2	3	4	5			

1/ Preceding each list of options, was the following statement: "Although placement of an exceptional child involves reviewing the total spectrum of the LRE alternatives, it is recommended that the ARD Committee review the following alternatives first."

2/ Similar information for Deaf/Blind; Auditory Handicaps; Speech, Language and Related Hearing Impairments; and Emotionally Disturbed was not given.

EXHIBIT 4: RECOMMENDED PLACEMENT OPTIONS BY HANDICAPPING CONDITION AND SEVERITY LEVEL (ARKANSAS)

	Possible services Recommended			
Condition	Itinerant Instruction	Resource Room	Special Class	Homebound/ Hospital
Emotionally Handicapped	MILD	MILD-MODERATE	SEVERE	requiring 24 hour behavior management & controls
Hearing Handicapped *	MILD	MILD-MODERATE	MODERATE-SEVERE (local or Arkansas School for the Deaf)	any student because of severity/ nature of condition
Specific learning Disability	MILD	MILD-MODERATE	MODERATE-SEVERE (minimum of 1/2 school day in special program)	
MR	MILD	MILD-MODERATE	MODERATE-SEVERE	
Multiple Handicap		MILD-MODERATE	SEVERE	
Physically Handicapped	MILD	MILD-MODERATE (health room with cot for rests)	SEVERE	
Speech/Language Impaired	MILD-MODERATE	MODERATE-SEVERE		
Visually Impaired	MILD	MILD-MODERATE	MODERATE-SEVERE (local or Arkansas School for the Blind)	

3.24

* Program selection not to be determined by degree of loss alone.

generally advocated by over half of the States (26) and specifically advocated (by giving examples or providing a rationale) by slightly more than one-third of the others (17). For only 7 States could no stand on this issue be found. Nearly two-thirds of the States (36) made clear and strong statements in support of the continuum of services concept; another third (17) generally supported the provision of a continuum. Only 2 States made no mention of this area.

The concept of a continuum within options was not addressed by most States.[1/] Only 1 State, Louisiana, explicitly mentioned a continuum within an option. In this case, regular class placement was broken down into the following areas:

- Indirect Services: regular instruction; regular instruction with consultation.
- Direct Services: team teaching; helping teacher; helping teacher-itinerant; resource teacher; resource teacher-itinerant.

Although not explicit, 5 other States clearly implied some sort of continuum within an option. Idaho referred to a continuum based on severity (e.g., resource room for mildly impaired, resource room for severely impaired). Vermont addressed "altering the restrictiveness of options" by, for example, making a special class less restrictive by becoming part-time. In Rhode Island, non-public, day, or residential schools were required to provide a continuum, thus by implication a continuum within each of their options was mentioned.

The majority of States (34) indicated that they required their LEAs to provide assurances as to the provision of a continuum of services. For an additional 6 States, LEA assurances were implied, but not explicitly stated. The remaining 10 States did not address this issue.

[1/] A continuum within an option refers to the concept that within any one placement environment there can also be a range of restrictiveness. Thus, by increasing or decreasing the amount of time in a placement, the type of interaction with other children, and/or the mode of instruction, a continuum within an option exists.

The way in which States encouraged the provision of a wide range of options was examined by reviewing statements concerning interagency agreements, State support, and State coercion. Interagency agreements were mentioned in detail by over half of the States (29) with another third (15) making general references to such agreements. States indicated helping LEAs to expand options by providing technical assistance (33), financial assistance (9), or manuals for implementation (6). State laws often were a manner of coercion to expand options (33). Similarly, nearly a third of the States (16) required their LEAs to detail their efforts to provide a range of options upon submission of their LEA applications. Financial coercion was also used by States to insure the appropriate range of options.

An interesting sidelight to the whole concept of a "continuum" was found in the Public Comments section of the Georgia APP. This required section of the APP contains all comments raised during public hearings on the APP, prior to submission to BEH. In the case of Georgia, one person took issue with the use of the word "continuum," arguing that it had judgemental implications for determining LRE. The text of this statement is given verbatim below:

> The word "continuum" is discriminatory. It implies that some educational settings are better than others, the regular classroom always being best. A continuum infers best to worse. Only the IEP can determine what is best for an individual child. The setting cannot be arbitrarily determined least or more restrictive except in regard to a child's needs. A regular classroom could be a most restrictive environment for a deaf and blind child and least restrictive for another. The word "continuum" should be eliminated. Recommend "variety" replace continuum. The APP should eliminate "continuum" entirely, since it tends to be heirarchical, discriminatory and judgemental as to the value or relative restrictiveness of any one environment.

The APP was changed accordingly to reflect these concerns.

To summarize, a wide variety of options and ways of reporting those options was found among States. Most States defined each of their options in the continuum; for many States this entailed making finer discriminations between services than had been suggested by the LRE table in the APP. Strong preference for options at the less restrictive end of

the continuum was found for a number of States. Many of these also provided suggestions for the order in which the array of options should be considered. The States also indicated strong support for the continuum of services concept and required assurances from their LEAs that a continuum was being provided at the local level. Interagency agreements were also encouraged to help expand options.

Research Question 5: Do States provide other guidelines for determining placement?

The APPs were also reviewed for any guidance the State might give in the criteria to be used in determining a child's placement, other considerations (such as prohibited criteria, weighted criteria, and decision rules), and interaction with non-handicapped peers.

The most frequently mentioned consideration in determining a child's placement was LRE (see Table 5); more than half of the States (27) indicated that restrictiveness should be taken into account when deciding among options. Proximity and the needs of the child were also mentioned frequently (25 for each). Slightly less than half of the States referred to the IEP (24) as a determinant in evaluating options. Other factors to be taken into consideration included that the placement would have no harmful effects (23) and that the quality of services would not be reduced (21).

Other, less frequently mentioned criteria to evaluate options which are not shown on Table 5 included: handicapping condition (16); appropriateness (9); age (7); availability (3); transportation (3); parents preference (2); extracurricular opportunities (1); and adaptive behavior (1).

Very few States offered criteria to be used in determining LRE (37, did not mention this area). Of those that did, the quality of services, no harmful effects, and the most appropriate environment were mentioned most often (10). (These three criteria were all included under the category of "other".) Time in the mainstream was cited by 8 percent of the States (4) and 4 percent (2) also indicated proximity as a

TABLE 5: EVALUATION OF OPTIONS

Criteria Mentioned	Frequency*
1. LRE	54.0 (n=27)
2. Proximity	50.0 (n=25)
3. No Harmful Effects	46.0 (n=23)
4. Quality of Services	42.0 (n=21)
5. Child's Needs[1/]	50.0 (n=25)
6. IEP	48.0 (n=24)

[1/] For the most part child's needs were unspecified or vague (n-19). Those states that did specify needs listed educational needs (n=7), medical needs (n=3), social needs (n=1), and emotional needs (n=1).

*Multiple responses were allowed.

determinant of LRE. One State suggested that the LRE was the environment with the fewest limitations and another that it was the most normal environment.

Other Placement Considerations

States could also provide guidance in determining placement by prohibiting criteria from consideration. Nearly one-fourth of the States (12) specified criteria which were not allowed to enter into the placement decision. Most mentioned that availability of options was prohibited from affecting the placement decision. Other prohibited criteria included transportation and cost. Several States put restrictions on the allowable age ranges of children in the same class. Other States cautioned that children with incompatible handicapping conditions (e.g., severely emotionally disturbed and spastic cerebral palsy) should not be placed in the same program. National origin, linguistic, or cultural differences were mentioned as prohibited criteria for determining placement in one other State.

Weighting of alternate criteria, i.e., which is more important, was reported by 7 States. These States usually indicated that proximity was an overriding consideration unless the IEP required some other arrangement. Clarification to this general guideline was provided by one State:

> This does not mean that if there is only one child in a school and if he needs the service of a teacher in a self-contained class that this will be provided on a 1-to-1 basis when there are several other children with the same need in a nearby school. These children will be brought together to be provided appropriate services.

Another State gave weighted criteria in the form of priority admittance to its Diagnostic Resource Center. Five types of students were identified and ranked according to their priority for service:

1. residents (5-21 yrs. old) experiencing academic failure
2. residents (0-5 yrs. old) whose handicap may interfere with future academic success
3. residents (15-21 yrs. old) in need of vocational guidance and testing

4. residents (0-21 yrs. old) served by the Department of Public Welfare (with agreement from the agency)

5. non-residents (0-21 yrs. old) provided they pay

Decision rules concerning placement were found for 13 States. In general, the States gave guidance by the type of placement under consideration or by the type of handicapping condition. Decision rules based on the type of placement generally took the form of ordering the sequence in which more restrictive options should be considered. For example:

- "No child shall be placed in a residential school unless there is no appropriate non-residential school available."
- "Placement in private programs is the third alternative of choice, only after the public schools or government agencies of the State cannot provide... If private programs are inadequate, then out of State placement may be approved."
- "When a residential educational program is indicated ...state-operated programs, when available, should be given first consideration; however the district shall recommend...the agency which is most appropriate to the individual situation."

When decision rules governed by handicapping condition were given, these usually indicated guidelines for placement of the more severe conditions:

- "The more profoundly handicapped shall be referred to special day schools and residential facilities. TMR students must be in self-contained programs...(it is the) only legal model due to the severity."
- "No mentally retarded student can be excluded from a special education class, unless:
  - -- enrollment is at the maximum amount
  - -- the child's intellectual ability, age, or behavior pattern is not compatible with the class as determined by the Superintendent of Public Instruction with help from medical, psychological, or psychiatric advice."
- "Children who meet the above criteria (multiple handicap - profound, with mental retardation and impairments in gross motor, hearing and blind) are not eligible for placement in a resource room."

One State (Arkansas) indicated blanket provisions for movement to less restrictive environments: "Tutorial aid (should) be provided when the

student moves from an isolated setting into the mainstream of the regular setting. This recommendation affects all students regardless of handicapping condition."

Interaction with Non-Handicapped Peers

The extent to which States emphasized interaction with non-handicapped children was another area of investigation (see Table 6). Slightly more than three-fourths of the States (39) addressed this issue, although many of the States were vague about where this interaction should take place and for what types of activities. Twenty States did not mention locations of any sort and 19 States did not specify activities. When States did provide more details, interaction in the school building (17) and in classes (12) was mentioned most often. The type of activities specified most frequently included: academic (12), extracurricular (12), and lunch/recess/assembly (8).

As we have seen, many States provided guidance in placement determination through a variety of means. LRE was mentioned most often as a criterion to evaluate options; proximity and the child's needs were also reported frequently. Several States also provided guidance in the form of prohibited criteria (availability, transportation, cost), weighted criteria (proximity unless the IEP indicates another arrangement), and decision rules (given by type of placement or handicapping condition). Although interaction with non-handicapped persons was frequently mentioned by the States, the location or activity involved was generally not specified.

Research Question 6: What additional requirements concerning the placement decision do States present?

State requirements concerning placement decision rationales, documentation of placement meetings, and justification of appropriate environment were also investigated. In addition, criteria for movement to a less restrictive environment and LEA evaluation of placement to determine if the LRE mandate has been met were other requirements examined.

TABLE 6: INTERACTION WITH NON-HANDICAPPED

Interaction		Percent of Total
1.	Not Mentioned	22.0 (n=11)
2.	Mentioned	78.0 (n=39)
	Location	Frequency*
	• In Class	24.0 (n=12)
	• In Building	34.0 (n=17)
	• Off Campus	4.0 (n= 2)
	• Not Mentioned	40.0 (n=20)
	Activity	Frequency*
	• Academic	24.0 (n=12)
	• Extra Curricular	24.0 (n=12)
	• Lunch, Recess, Assembly	16.0 (n= 8)
	• Other	22.0 (n=11)
	• Not Mentioned	38.0 (n=19)
	TOTAL	100.0 (N=50)

*Multiple responses were allowed.

State Requirements

As shown in Table 7, most States (42) required a written rationale for the placement decision for all students receiving special education. One State required a rationale only for students placed outside of the regular school. For the most part, this rationale consisted mainly of notifying the parents of the reasons for the placement decision. Some form of documentation of placement meetings (other than the placement decision in the IEP) was required by a majority of States (31). One State only recommended this procedure. Finally, a justification of appropriate environment (again, usually through notice to the parents as to why other options were rejected) was required by over half of the States (29) and recommended by one State.

Several States had detailed requirements for documentation of placement. Alabama required the following: date, location, and time of meeting; members present; each pupil discussed with documents and evidence reviewed by the committee; disposition of each case with a statement concerning the use of LRE in placing referred children in programs; and the signature of all members present. Louisiana attached to the IEP a chart with all of the LEA's alternative settings, the available settings, and the dates of placement. In Maine, a statement of parental involvement in developing the IEP was written along with parent participation required in the program. Montana recorded all dissenting opinions which might then be used later in identifying potentially helpful alternatives.

Movement with Respect to Restrictiveness

A number of States indicated criteria for determining if a child should be moved to a less restrictive environment. The overwhelming majority (40) addressed this by specifying that the child's IEP, other information, and recent evaluation data must be considered. Two States alluded to "readiness indicators," but did not elaborate enough to be included in this category. The remaining States (8) made no mention of this issue.

TABLE 7: ADDITIONAL PLACEMENT DECISION CONSIDERATIONS

Activity	Required		Recommended		No Mentioned	Other	Total % of Row
	Reg[1]	Non-Reg[2]	Reg[3]	Non-Reg[4]			
1. Documentation of Rationale for Decision	84.0 (n=42)	2.0 (n= 1)	-	-	14.0 (n= 7)	-	100.0 (N=50)
2. Documentation of Placement Meeting	62.0 (n=31)	-	2.0 (n= 1)	-	32.0 (n=16)	4.0 (n= 2)	100.0 (N=50)
3. Justification of Appropriate Environment	58.0 (n=29)	-	2.0 (n= 1)	-	40.0 (n=20)	-	100.0 (N=50)

[1] Required for all special education students.

[2] Required for special education students attending non-regular education schools.

[3] Recommended for all special education students.

[4] Recommended for special education students attending non-regular education schools.

Evaluation

Finally, few States indicated that LEAs should conduct an evaluation of placement to determine if the LRE mandate had been met. (This category did not refer to simply an annual evaluation of each child. To be coded as present, the State had to specify that LRE was a focus.) Thirty-nine States made no mention of this activity; 2 others alluded to it, but were not specific enough to warrent inclusion; the remaining 9 States indicated some LEA assessment of the placement decision with regard to LRE. In Delaware, the State monitored the LEAs to ensure that they evaluated their decisions by determining if the student could benefit from a less restrictive environment. In North Dakota, LEAs must review the LRE of each placement; to assist in this, the IEP must show what other alternatives were considered in planning. Montana required an evaluation of LRE for out-of-district placement.

In summary, several other requirements surrounding the placement decision were indicated by the States. Through required notice to the parents, some form of rationale (the reasons for the decision) and justification (why other options were rejected) were mentioned by most States. A majority of States also stipulated that some documentation of the placement meeting was required. Criteria for movement to a less restrictive environment were reported by most States; these included the child's IEP, other information, and recent assessment data. Few States, however, indicated that LEAs must evaluate the placement decision to determine if the LRE mandate had been met.

Research Question 7: What ancillary activities (such as training and monitoring) have States engaged in to facilitate placement decision-making?

A great many States indicated that they provided or were going to provide training in LRE (43). It was difficult to determine, however, whether this training was selected as a result of needs assessments or not. For nearly one-third of the States (15), some indication that a needs assessment was conducted -- and indicated LRE as a priority topic -- was found. The remaining States either did not mention any needs assessments (14) or alluded to one, but failed to indicate LRE as a concern (14).

Nearly all of the States (45) reported some form of periodic review of their LEAs, with this review usually conducted on an annual basis (22). Other forms of monitoring reported by the States included financial audits (12) and upon LEA application for funds (13). Placement and LRE were often specified as a focus of State monitoring activities (41). In addition, States also looked into assessment data used (27), the available options (24), evaluation procedures (22), and documentation (22).

Most States used a combination of on-site visits and written reviews to conduct their monitoring (42). Few corrective actions resulting from State monitoring were mentioned, although 2 States mentioned expanding placement options and 1 State indicated that the quality of services needed to be improved. Several methods to assist LEAs in correcting any problems were mentioned, primarily training and technical assistance (27) and added funding (7).

The States, therefore, indicated considerable training and monitoring efforts in the area of placement and LRE. A combination of on-site visits and written reviews was most often used by the States when monitoring. Training and technical assistance and additional funding were frequently noted as ways to correct deficiencies identified in the course of monitoring.

Research Question 8: What constraints have States encountered in implementing LRE?

A wide range of difficulties in implementing LRE was identified by the States (See Table 8). In general, these constraints revolved around staff (19); lack of money (16); lack of options (16); and providing services for low incidence students (13). The main problem the States reported with staff was that there were not enough qualified teachers, especially for the more unusual conditions (14). Several States also indicated that regular classroom teachers needed to be trained to work with handicapped students. A lack of options was frequently related to problems with low incidence exceptionalities and was especially pronounced in rural/low density population areas of the States. Thus, in these isolated areas, the States reported difficulties in providing appropriate placement options when there were too few students to receive

TABLE 8: STATE LEVEL CONSTRAINTS

Constraints	Frequency*
1. Staff	38.0 (n=19)
Staff Constraints	**Frequency***
• Not Enough at SEA Level	2.0 (n= 1)
• Not Enough at LEA Level	12.0 (n= 6)
• Not Qualified	28.0 (n=14)
• Other	4.0 (n= 2)
2. Attitudes	20.0 (n=10)
Attitudinal Constraints	**Frequency***
• Parents	8.0 (n= 4)
• Teacher	12.0 (n= 6)
• Community	2.0 (n= 1)
• Students	4.0 (n= 2)
• Other	8.0 (n= 4)
3. Determing LRE	6.0 (n= 3)
4. Low Incidence Students	26.0 (n=13)
5. Architectual Barriers	6.0 (n= 3)
6. Materials	4.0 (n= 2)
7. Lack of Options	32.0 (n=16)
8. Funding Formula	2.0 (n= 1)
9. Not Enough Money	32.0 (n=16)

*Multiple responses were allowed.

services. Transportation problems were often a related obstacle, as several States expressed concern that children in rural areas often had to travel long distances to receive services.

Only 3 States specifically reported that determining LRE was a problem. South Dakota indicated that their teachers and administrators needed inservice in the criteria for determining LRE. Illinois reported constraints in "reconciling philosophical differences among and between LEAs regarding the relative merits of different alternatives along the continuum." It was Pennsylvania, however, that raised some of the most far-reaching questions concerning implementation of LRE. Their statement from the APP is cited verbatim below:

> ...The conceptual complexity of restrictiveness in environment confuses applications. For example, Pennsylvania's continuum indicates that generally the most restrictive alternative is an intermediate unit of program instruction in the home, yet for a very young child the home can be a very natural and non-restrictive learning environment. How does the restrictiveness relate to type, severity, multiplicity of handicaps, prior experience, and present skills? Relationships between instructional environments and administrative arrangements are not yet clear to everyone. These matters must be considered and resolved for individual children by IEP planning teams.

Thus, the crux of LRE implementation -- weighing all factors and alternatives -- was succinctly summed up.

Although most States reported constraints, fewer indicated possible solutions. The major strategies to overcome difficulities were: training and technical assistance (14), increased cooperation among agencies (8), and additional funding (6).

In conclusion, implementation of the LRE provision of P.L. 94-142 was constrained primarily by lack of qualified staff, options, and money. Very few States indicated that the concept of LRE itself presented difficulties. Given the general lack of information on LRE presented by the States, however, this finding was difficult to interpret. The possibility exists that until the States begin directly addressing the specific ramifications of LRE, they are unlikely to encounter problems in this area.

SECTION 2: ISSUE SPECIFIC FINDINGS

In the following section, major issues of concern to this study are given a more detailed examination. Relationships between or factors which may affect the findings are explored for the following areas of interest: LRE, mainstreaming, placement meetings, level of specificity (handicapping condition), and sequence of meetings.

Least Restrictive Environment

As has been evident from the findings discussed so far, very little specific information concerning LRE was expressed in the APPs. Where LRE was addressed, one of two main themes appeared to predominate: either mainstreaming or normalization. The distinction would seem to be between a strict interpretation ("LRE is placement in the regular class") or a broader view ("the result of the process of considering all possible educational alternatives to meet the IEP and selecting the educational setting with the most interaction with non-handicapped students"). To the extent that State-expressed concerns surrounding placement were indicative of trends in this area, the shift appeared to be moving toward a more comprehensive and individualized approach to LRE. Regular class placement may not, de facto, be the least restrictive alternative. For example, Mississippi indicated concern over the lack of understanding of the thrust toward LRE and the impression that all handicapped students must be returned full time to general education. Similarly, Oklahoma pointed out that regular class placement could be as restrictive "to a child's freedom to learn as would inappropriate assignment to some special program."

The application of LRE appeared to have had the effect of concentrating attention on placement options and sheer physical proximity rather than on the total environment and individual needs of the child. In Utah, there was a recommendation that the concept of LRE be expanded to include "provisions for strategic integration in which the handicapped person is confronted with coping problems and guided in solving them." Another suggestion was to broaden LRE beyond service patterns to encompass teacher styles (i.e., more creative versus more restrictive).

Hawaii indicated concern that "placement (with normal children would) overshadow the need for a child to have appropriate specialized education and services." Similarly, Kansas urged going beyond the emphasis on specific types of programs, (e.g., self-contained, resource room) to "applying the principal of normalization to each learning experience."

That steps are being taken to expand upon LRE in its application was evident from some State Plans. Delaware, for instance, rejected standard placement criteria in lieu of individually determined, and continually fluctuating placement needs:

> The level at which a handicapped child receives the necessary services is dependent upon the level at which the child study (IPRD) team feels the individual can function. No arbitrary cut off lines should be determined in advance as to the kinds of problems which will be served at which levels as most placements can be considered as only a step in a process due to the fact that the handicapped student should be continually moving toward the mainstream and his or her least restrictive alternative.

Washington has widened the integration goal to include interaction with children and adults who are less handicapped and non-handicapped.

South Dakota developed detailed procedures to accompany reintegration, whenever this was called for. First, the special education teacher visits the reintegration site and helps structure the program. There is a review by the placement committee and if the provisions seem adequate, change in placement is approved. The special education teacher then talks with the receiving teacher and duplicates the environment of the receiving classroom to accustom the student. The receiving teacher visits the special education classroom and observes the child. Lastly, the teacher meets with the parents to ensure they are fully informed. Reintegration should occur toward the end of the week, not on a Monday or following a holiday. On reintegration day, a representative of the placement committee visits the receiving teacher. Thus, South Dakota has gone beyond the sheer concept of physical presence in a regular classroom, to a comprehensive approach to the child's needs and growth.

The extent to which an LRE policy statement may be related to these different State approaches to LRE guidance was examined. For example, the degree to which placement options were defined was compared to the specificity of LRE policy statements. Although one may expect those States with detailed policy statements to also have detailed definitions of placement options and vice versa, this does not appear to be the case. While over half of the States had policy statements that were the same as the law (29), only 4 percent (2) defined their options the same as the law. Conversely, 8 States cited policy statements that expanded upon the Law, but half of these (4) defined placement options the same as the Law. Only 1 State had both a policy statement and a definition of options that both expanded upon the Law. Thus, it would seem that the existence of an LRE policy statement had no guiding effect on the detail with which placement options were defined.

Similarly, the relationship between LRE policy statements and the requirement to evaluate placement decisions for LRE was explored. Again, State policy did not appear to affect evaluation requirements. Even though only 9 States required an evaluation of the LRE component of the placement decision, 2 of those States gave no LRE policy statement. It was curious, indeed, that 2 States would require evaluations of LRE, yet not (apparently) have a State policy in that area. States with policies going beyond the law did not appear to emphasize LRE evaluation either. Out of a total of 8 States with detailed policies, only 2 required evaluations, while 6 did not. Providing a definition of LRE seems to have no correspondence to LRE evaluation, either. Although 18 percent of the States (9) required this evaluation, 10 percent (5) required the evaluation, but did not provide a definition of LRE.

It would seem, therefore, that the explicitness with which States provided policy statements and definitions of LRE had little to do with LRE related procedures, such as evaluation of placement decisions and explanations of options. Similar findings resulted when looking at such variables as monitoring, notification, prohibited criteria, preference for regular placement, etc.

"Mainstreaming" and LRE

The concept of least restrictive environment embraces the most normal educational setting possible. To the extent that the normal educational process is interfered with, the setting has become more restrictive.[1/] "Mainstreaming" on the other hand involves the concept of returning a handicapped child to the normal or regular education process. The implication is that the student is a "special student," still under the auspices of the special education staff, and is only returned to regular education to the extent that special education permits it. The distinction between LRE and mainstreaming is subtle and perhaps focuses more on the conscious and complex choice of least restrictiveness compared with the more simple decision to "mainstream in nonacademic or other appropriate areas." Because of this subtle distinction confusion frequently occurs, both conceptually and in application.

There was some evidence that State policies reflected this confusion. Table IV in the APPs for reporting the incidence rates for least restrictive environments was often modified by States in order to better reflect their own particular range of placement options. Sometimes these were categorical or handicap specific and often only category totals were reported (regular class, self contained, etc.).

Table 9 shows the distribution of State plans which specified a criteria for determining LRE and the associated definitions for LRE. While more than half of the States did not define LRE in their APP, 24 percent simply defined LRE as "mainstreaming" even though they applied a variety of criteria to determine LRE.

The 1979 Annual Report to Congress on the Implementation of PL 94-142 expressed some concern over this confusion of LRE and "mainstreaming" (p. 40). From this review of State policies it appears that State level confusion, as reflected in written policies, may, in part, be a source of this confusion. While it is doubtful that the clear lack of a definition for LRE at the State level would contribute to the confusion, it is more

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1/ Developing Criteria for the Evaluation of Least Restrictive Environment Provision, DHEW, BEH, 1978, p. 7.

TABLE 9: DEFINITION OF LRE BY CRITERIA TO DETERMINE LRE

Criteria	Definition: % of Time In Mainstream	Normalization	Mainstreaming	Most Appropriate Placement	Other	No Definition
1. % of time in Mainstream	___	___	6.0 (n= 3)	___	2.0 (n= 1)	2.0 (n= 1)
2. Fewest Limitations	___	2.0 (n= 1)	___	___	___	___
3. Normalization	___	___	___	___	___	2.0 (n= 1)
4. Proximity	___	___	4.0 (n= 2)	___	2.0	___
5. Other	___	2.0 (n= 1)	12.0 (n= 6)	___	10.0 (n= 5)	2.0 (n= 1)
6. No Mention	2.0 (n= 1)	4.0 (n= 2)	10.0 (n= 5)	8.0 (n= 4)	2.0 (n= 1)	56.0 (n=26)
CRITERIA TOTALS[1]	2.0 (N= 1)	8.0 (N= 4)	32.0 (N=18)	8.0 (N= 4)	16.0 (N= 8)	62.0 (N=31)
STATE TOTALS	2.0 (N= 1)	8.0 (N= 4)	24.0 (N=12)	8.0 (N= 4)	12.0 (N= 6)	60.0 (N=30)

[1] Criteria totals do not equal State totals because multiple responses were allowed for each state.

probable that a precise and straightforward definition would at least assist substantially in clarifying the distinction between the two and in ameliorating to some degree the extent of the problem.

Placement Meetings

The written policies of the States concerning placement meetings were somewhat varied with respect to certain elements of formal placement determination. As was previously discussed, most States did not specify the number of required placement meetings nor the sequence they should occur in, preferring to allow each LEA to best accomodate meetings to their own administrative procedures. However, with respect to participants in those meetings and their extent of participation in the meeting, there was some variety across States and some inconsistency within States.

Across the States, most Plans (more than 75%, see Table 2) specified four general types of participants, including a representative of the administration (either the building principal or the director of special education), the child's teacher (either the regular class teacher or the special education teacher), the parents, and "other appropriate personnel" (ususally to be identified at the discretion of the parents or school personnel). About half of the States (58%, see Table 2) mentioned the diagnostician or the child as meeting participants; however, very few States identified when it was appropriate for the child to participate and almost all States required assessment personnel to interpret their test information during the placement determination process. In other words, while the diagnostician and the child were mentioned as meeting participants, their role and extent of participation was not clear.

Similarly, the role of the parent in the placement process was not fully explained. Almost all States (96%, see Table 10) required parental consent for assessment and all but one-fourth of the States (72%) required consent for placement. However, only 12 percent of the States (see Table 11) required the parent to attend the placement meeting. Forty percent recommended parental attendance but specified alternatives and for 26 percent their policy was not clear. Eleven states (22%) did not mention the role of the parent in placement determination.

TABLE 10: PARENTAL CONSENT REQUIREMENTS

Procedures	Percent Responding: Consent Required	Other (e.g. Notification) only	No Mention	Total % of Row
1. Referral	—	12.0 (n= 6)	88.0 (n=44)	100.0 (N=50)
2. Assessments	96.0 (n=48)	4.0 (n= 2)	—	100.0 (N=50)
3. Placement	72.0 (n=36)	18.0 (n= 9)	10.0 (n= 5)	100.0 (N=50)
4. Change In Placement	30.0 (n=15)	32.0 (n=16)	38.0 (n=19)	100.0 (N=50)

TABLE 11: PARENT PARTICIPATION IN PLACEMENT MEETINGS

Attendance Policy	Percent of Total
1. Parent Attendence is Required	12.0 (n= 6)
2. Parent Attendance is Not Required	40.0 (n=20)
3. Attendance Policy is Unclear	26.0 (n=13)
4. Parent is Not Specified as a Placement Team Participant	22.0 (n=11)
TOTAL	100.0 (N=50)

This raised two questions regarding parent participation in placement determination. The first was the extent to which consent, which was required, was truly informed consent. Since written consent for assessment and for placement was required by so many States, some form of communication with the parents must occur. If attendance at placement or planning meetings was not ensured, then parent contact would be left to mail correspondence or a home visitor - neither of which put the parent in direct contact with the placement decision-makers. The second question raised by these figures was the extent of effective parent participation in the decision process. While all States provided written notification to parents regarding placement meetings, procedural safeguards, and placement decisions, the permissive policies regarding attendance at placement meetings may belie the actual extent of participation. As discussed earlier under Research Question #3, most States (70%, see Table 12) required that parents be informed of placement options and that the parents receive an explanation of which options were considered and why each was accepted or rejected. Presumably this allowed the parents an opportunity to review the relevant placement alternatives as well as the rationale for consideration of each alternative. Again, however, unless such information was provided to the parents by the placement decision-makers themselves it was difficult to envision the actual extent of contribution effected by such policies concerning the participation of parents.

Only ten States did not specify <u>any</u> criteria for meeting participants. More than half of the States (see Table 13) specified that knowledge of the child, knowledge of the placement options being considered and personnel associated with those options, understanding the evaluation results, or personnel of the same ethnic group (if the child was a minority) as selection criteria for meeting participants. These requirements were not imposed in a restrictive manner so as to limit the number of participants, but rather as a quality control measure to ensure that a broad spectrum of information was present in placement decisions. Although only 32 percent of the States explicitly mentioned an interdisciplinary team for assessment and planning purposes, another 8

TABLE 12: AVAILABILITY OF INFORMATION FOR PARENT

Information Required	Frequency*
1. Parent Rights	100.0 (n=50)
2. Results	92.0 (n=42)
3. Due Process Procedures	100.0 (n=50)
4. List of Options	70.0 (n=35)
5. Other (Actions Proposed, Reasons, Options Rejected)	78.0 (n=39)

*Multiple responses were allowed.

TABLE 13: CRITERIA FOR TEAM PARTICIPATION

Criteria	Frequency*
1. Knowledge of Child	58.0 (n=29)
2. Knowledge of Options	48.0 (n=24)
3. Knowledge of Handicapping Condition Under Consideration	16.0 (n= 8)
4. Other (Meaning of Evaluation Results, Knowledge of Personnel, Same Racial Group)	66.0 (n=33)
5. No Mention	20.0 (n=10)

*Multiple responses were allowed.

percent of the States strongly implied support for this approach and the remaining States simply did not reference any such composition in the materials which were reviewed (see Table 14). Most of the States appeared to have established policies for placement meeting participants which were inclusive rather than exclusive and which focused on quality control measures that tended to broaden the source of information brought to those meetings.

In summary, State policies regarding placement meetings tended to be inclusively oriented, broad based with respect to information sources, and especially accomodating of special meeting needs of parents. While most of the policy elements which ensured informed consent were present in almost all State policies, parental attendance policies at placement and planning meetings may pose special problems. Because States may be reluctant to impose required parent attendance at these meetings (indeed, some States may not have the authority to do so even if they desired to) a wide variety of alternatives were suggested. These included mail correspondence, telephone interviews, home visitors who represent the schools' recommendations, and local authority for the school to determine and make any placement they deem in the best interest of the child. Recent field experience conducting data collection on placement decisions, however, has indicated that LEA applications of SEA policies or guidelines may vary substantially. For example, some LEAs in our sample required parent attendance at all placement relevant meetings, even thought the State policy with respect to parental attendance was only to "recommend" parent participation. Therefore, this summary of State policies may not accurately reflect LEA practices or the SEA role in leadership through training and technical assistance efforts.

Level of Specificity (Handicapping Condition)

Some States, such as South Carolina, provided extensive detail concerning eligibility standards, assessment guidelines, and facility specifications by handicapping condition. Other States, such as Arizona, did not provide such documentation with their APP. Because Arizona was one of the field study sites, however, in the course of data collection,

TABLE 14: INTERDISCIPLINARY TEAM INVOLVEMENT

Mention of Interdisciplinary Team	Percent of Total
1. Explicitly Mentioned	32.0 (n=16)
2. Implied	8.0 (n= 4)
3. Not Mentioned	60.0 (n=30)
TOTAL	100.0 (N=50)

similiar guidelines were obtained. Therefore, while not all States provided APP documentation of such specific detail (48% provided references of some kind to handicap specific guidelines), this may be an artifact of the documents available to the reviewers.

Among the 24 States which supplied documents describing handicap-specific considerations, there was a considerable range of depth and scope. Two State plans reported such a level of specificity to be desirable, but they did not provide any themselves. South Carolina, on the other hand, provided handicap specific guidelines on assessment, eligibility, placement meeting participants, and criteria for movement. Exhibit B5 (see Appendix B) presents selected pages from the Appendix of the South Carolina '78 APP. It illustrates the extent of detail provided for the handicapping condition of Learning Disability with respect to assessment data, eligibility determination, exclusion factors, criteria for change of placement, and models of recommended program options. Although South Dakota did not provide assessment guidelines specific to handicapping condition, their State plan specified placement options and reintegration procedures by handicapping condition.

The depth with which some States have developed placement guidelines was considerable. Alabama, for example, provided an order in which various options should be considered according to handicapping conditions (See Exhibit 3). Further, their guidelines gave definitions of each handicapping condition, evaluations to be done, documents and evidence to be presented to the placement committee for review, teacher certification, and architectual barriers to be considered for each handicapping condition.

Twenty-two State plans (and supporting documents) contained detailed and specific guidelines by handicapping condition for some or all of the following areas:

- Assessment instruments and procedures
- Eligibility standards
- Program standards

- o Placement criteria
- o Placement meeting participants

Such specific attention to detail also tended to occur in the way some State plans addressed options and the continuum of placements. Missouri, for example, proposed a "Cascade" (See Exhibit 2) in place of the Table IV categories specified in PL 94-142. This "Cascade" represented each placement option by severity and also by location of service. Arkansas recommended placements by both handicapping condition and severity level (See Exhibit 4).

These approaches to describing and providing statistical data or the options illustrate one area where States experienced some difficulty with the identification of options. Although almost all States reported statistics in Table IV which corresponded to the eleven main option categories specified by PL 94-142, not all States described their options as those same eleven categories. For example, about one half of the States (see Table 15) reported only four main categories: regular class, self contained, day or residential school, and hospital/homebound. Because their own specific continuum of options differed, as in the two examples above, many States were not able to supply data for the more specific subcategories. The net impact was that several States elected to establish option categories specific to some predetermined areas (handicapping condition, severity, service department, etc.). This only created a problem for statistic reporting at the smallest level, since States with different options from those described in PL 94-142 were still able to provide data for the four major option categories.

Sequence of Meetings

According to PL 94-142 "... each handicapped child's educational placement shall be ... based on his/her individualized education program." Table 16 shows that 56 percent of the State plans specified or at least mentioned a sequence of steps to be followed in referring, assessing, planning and determining placement. These sequences varied substantially in detail and scope, but most addressed the length of

TABLE 15: USE OF PLACEMENT OPTIONS

Frequency* of Reported Grouped Data	Placement Options Used In States	Frequency* of Reported Specific Data
54.0 (n=27)	Regular Class - Indirect	36.0 (n=18)
	Regular Class - Direct	40.0 (n=20)
	Regular Class - Resource Room	40.0 (n=20)
54.0 (n=27)	Self - Contained - Part Time	40.0 (n=20)
	Self - Contained - Full Time/ Regular School	44.0 (n=22)
	Self - Contained - Full Time/ Special School	42.0 (n=21)
48.0 (n=24)	Private Day School	38.0 (n=19)
	Public Residential	44.0 (n=22)
	Private Residential	32.0 (n=18)
50.0 (n=25)	Hospital	36.0 (n=18)
	Home Bound	42.0 (n=21)
	Cascade System	2.0 (n= 1)
	Extended Diagnostic Placement	6.0 (n= 3)
	Other (Group Homes, Reverse Mainstreaming, Voc/Adult Educ.)	22.0 (n=11)

*Multiple responses were allowed.

TABLE 16: DESCRIPTION OF PLACEMENT PROCESS SEQUENCE OF STEPS

Level of Detail	Percent of Total
1. Sequence Specified	44.0 (n=22)
2. Sequence Only Mentioned	12.0 (n= 6)
3. Sequence Not Mentioned	44.0 (n=22)
TOTAL	100.0 (N=50)

time which should elapse between referral and placement and incorporated the various notification/due process procedures for parents. The sequence within which the IEP, general goals, and specific objectives were developed relative to the placement decision, however, was not a specific focus of this document review. Because the contextual sequence was not routinely searched for in the APPs of each State, the findings must be regarded as incomplete. However, that a sequence was found in over half of the FY '78 State plans, indicates the presence of policies which structure and order the decision-making process.

Although over half of the State plans referred to a sequence of steps, not all of them specified when the IEP or various elements of the IEP were to be developed. In addition, other elements of the APPs tended to confuse this area. In trying to determine the participants for the placement meeting, for example, references to as many as three or four meetings could be found, each with a list of recommended or required participants (for the IEP meeting, for an assessment team meeting, for a case study team meeting, etc.). It often was not clear, however, where the actual placement decision itself was made.

Most State plans did not specify a fixed number of meetings per case, preferring to allow the contingencies of each case and the administrative procedures of the LEA to determine that. In several States, however, the IEP meeting was listed specifically in the sequence of decision-making, indicating when in this process general goals were developed and when specific objectives were determined. Because these meeting participants were discussed in different sections of the APPs and because the placement decision process was not always fully explicated in the documents which were reviewed, it was difficult to determine where the IEP occurred relative to the placement decision in most States. BEH has expressed some concern over this issue as reflected in the 1979 Report to Congress which identified a range of practices with respect to IEP development, short and long range goals, and the placement decision. One State, for example, indicated that "... the IEP must be developed before special education placement is implemented." They described among the

functions of their placement committee the designation of who will be responsible for developing the IEP within 30 calendar days of the committee placement decision, approval of the IEP, and approval of transportation logistics when considering appropriate placements. Although this may imply development of the IEP after the placement decision but prior to the actual placement, it was not clear at what point IEP development was really initiated (or completed).

Some States have approached this problem by separating IEP development into two distinct phases (short term and long term objectives) or by conceptualizing the process into a long term developmental activity which essentially begins upon referral and assessment and continues as long as the child is receiving services. Examples of the sequence of meetings and decisions were discussed earlier in this chapter (Exhibit 1) and illustrated the somewhat in-exact treatment of IEP development with respect to LRE placement determination. Additional information of a more precise nature should be available as a result of the field study of local placement practices.

One major finding with respect to State policies was that over half of the States mentioned or specified a sequence of placement decision-making, but that it was often unclear as to the extent of integration or separation of participant roles throughout the process or the exact timing of the development of the IEP. Data from the field studies may be able to clarify these sequences and participant roles.

4

SUMMARY AND CONCLUSIONS

As would be expected, across 50 State Annual Program Plans there was a wide variety of placement information and guidelines. In a number of areas under investigation, a substantial range of State approaches was identified. Many of the States provided very detailed information, although no one State ever addressed all of the concerns in this study. Similar placement procedures were noted often, usually for areas in which Federal guidelines had been developed. There were also several study areas which very few States addressed or which were mentioned in a vague or ambiguous way. In contrast, very specific strategies for operationalizing the Law were identified for a variety of placement activities, covering many different aspects of the placement process. Finally, an attempt to determine if there were any factors which could explain variations among States was also made.

To summarize our specific findings in each of the above-mentioned areas, the four main study purposes outlined in Chapter 1 will be given again. Each study purpose will be followed by the general results of the content analysis and our conclusions from these findings.

Study Purpose 1: To obtain a general overview of the range and specificity with which States addressed placement and related issues.

As mentioned earlier, although no one State addressed all of the issues of concern for this study, many States provided highly detailed information for selected placement procedures. This was especially notable for those States with administrative manuals. These documents

generally included definitions of handicapping conditions, eligibility criteria, recommended tests for each area of suspected exceptionality, and recommended placement options. Thus, for those areas generally addressed by administrative manuals, highly specific information was provided. The States also tended to address the types of placement alternatives provided in their State in a highly detailed manner. Placement options were frequently defined and often broken down into finer discriminations than the 11 reporting options listed in the LRE table in the APP.

The range of information varied greatly among States in the areas of placement meeting names and time intervals allowed between steps in the placement process. These two categories were, perhaps, the most disparate of any investigated. Placement meetings were called anything from "planning conferences," "staffings," "child study," "IEP," or "evaluation" committees. Several States indicated "multidisciplinary" meetings, but there was rarely a substantive modifier to indicate the function of the conference. Finally, several States did indicate having a "placement" committee where -- at least by the clear inclusion of the term "placement" -- the function of the group was known. The highly discrepant nomenclature evidenced with the placement meeting also reflected a general ambiguity surrounding the actual placement decision. It was often difficult to determine when (and by whom) the actual decision was to be made.

A wide range of information was also gathered concerning maximum time spans allowed between steps in the placement process. The time intervals between assessment and the placement meeting, for example, ranged from 5 to 90 days. Similarly, from the placement meeting to initial placement, a range of 15 to 60 days was found among States. To further complicate matters, many States divided the placement process differently. Thus, one State provided time allowances from identification to the placement meeting, and another from identification to actual placement.

In conclusion, the States appeared to be more specific and provided more detailed guidance in those broader, generalizable aspects of placement. Administrative manuals addressing handicapping conditions,

assessments, and placement possibilities, were most notable in this area. Concerning the types of options available, the States also tended to be more specific. The greatest variability among States was noted for more concrete aspects of placement: the name of the meeting and the time spans allowed between steps in the placement process. In large part, this variety may simply reflect State idiosyncracies and flexibility. These discrepancies, however, may imply uncertainty concerning responsibility for the placement decision (as with the placement meeting titles) or potentially inordinate waiting periods to receive services (for those States with unusually long time spans between placement activities).

Study Purpose 2: To highlight common features of State placement policies as well as frequently overlooked or ambiguous areas of concern.

In general, the States showed greatest consistency for those aspects of placement already addressed by Federal guidelines. Thus, nearly all States reported notifying parents of decisions; providing in this notice a rationale (the reasons for the decision) and justification (why other options were rejected); and conducting an annual evaluation of placement. The States also were similar in their strong expression of preference for regular class placement and for the provision of a continuum of services. Some States, however, went beyond mere reiteration of these Federal requirements by supplementing or detailing specific procedures to operationalize the Law. These exemplary practices are discussed in the following section, under Study Purpose #3.

In several other areas of placement activity, a number of States provided only vague or ambiguous information. For example, although parents were often mentioned as participants at the placement meeting, standard procedures excluding the parent from decision-making were also evident. Thus, "informal" meetings or "interpretive" conferences with the parent to explain the placement decision, ex post facto, were mentioned. Such meetings were not qualified by statements that they were only in the event that the parent could not attend the regular placement meeting. They appeared, from the APP, to be standard operating

procedures of the State. Related to parent involvement in decision-making was the area of parental consent for placement. Here, too, the States were often vague in their requirements.

Similarly, little information concerning the relationship between the IEP and placement was found. It was frequently not possible to discern whether placement was done before, after, or at the same time as the IEP.

In summary, Federal requirements appeared to be a systematizing force in several areas of placement-related procedures. Many States did not stop with this, however, but went beyond the Federal directives in their guidance to LEAs. In contrast, other key areas related to placement lacked clarity and consistency. This may be due to the inability of States to require certain procedures (such as parental participation) or by State preference to allow local determination (such as the order in which the IEP and placement would occur). An additional possibility also exists, however. The Federal requirements in the two areas just mentioned are not explicit, so State policies may also be a reflection of these uncertainties.

Study Purpose 3: To identify unusual or exemplary practices which aid in operationalizing placement-related aspects of the Law.

Throughout this report a number of exemplary practices have been mentioned. Thus, the reintegration policy of South Dakota; the evaluation safeguards for non-English tests in New Hampshire; the parent/child advocates in California; the documentation of rejected options for later use in Montana; and the rigorous monitoring of placement every 12 weeks in Kansas (including follow-up after exit from special education) are all examples of practical approaches to implementation of the Law. Administrative manuals, such as those discussed for Alabama and Arkansas, also appeared to be helpful ways for the States to assist LEAs through the provision of highly detailed information.

As was evident from the brief enumeration above, no one State or geographic area had a monopoly on exemplary practices. Most States appeared to have concentrated on discrete aspects of placement (e.g., non-discriminatory testing) and to have developed specific procedures in

those areas, resulting in an exemplary practice. Taken together, each State's contribution to placement procedures offered a wealth of strategies for implementation of the Law.

Study Purpose 4: To explore factors which may explain differences in the kind and extent of guidance concerning placement which States provide.

In part because little information on LRE was found and in part because no clear evidence of relationship appeared, there seemed to be no factors which would explain variations in State procedures. Neither an LRE policy statement nor a definition of LRE appeared to explain differences in State guidance concerning placement. Nor was there any indication that States that were highly specific in one area would be equally as specific in related areas. As was evident from the preceding discussion of exemplary practices, each State was unique in the kind of and degree to which guidance in one area versus another was given. Due to this high variability within each State, therefore, it was not possible to identify any factors which appeared to be related.

In conclusion, the APPs provided a wealth of information concerning many aspects of placement. Through analysis of these documents, a variety of State approaches to placement and specific guidelines for implementation were identified. Although most States provided little information on LRE, a great deal of other, related information was reported. This may indicate that the States have chosen to address the more concrete aspects of the placement process first, rather than the theoretical implications of LRE. The wisdom of such an approach may be questionable, yet given the ambiguities surrounding the concept of LRE, such a strategy is understandable.

APPENDIX A:

Content Analysis Form
and
Classification Criteria

CONTENT ANALYSIS FORM

I. STANDARD OPERATING PROCEDURES

A. Policy Statement

Classification

A1. Policy Statement

2. No
1. Yes ⟶ 1. Same as law
2. Beyond law
(Record verbatim) _____
_____

A2. Definition of LRE

2. No
1. Yes ⟶ _____ % time in mainstream
_____ fewest limitations
_____ normalization
_____ school normally would attend
_____ mainstreaming
_____ no harmful effects
_____ stigma
_____ individually determined placement
_____ most "appropriate" placement
↳ Definition of "appropriate"?
1. Yes _____
_____
_____
2. No mention
3. Other _____
_____
_____ Other _____
_____
(Record numerical order given)

A3. LEA Policy Statement

1. No mention
2. Required
3. Recommended
4. Other _____

B. Formalized Procedures

B1. Formalized Procedures

3. No
2. Partial
1. Yes ⟶ _____ notification (Answer IB5)
_____ meetings (Answer IB3)
_____ participants (Answer IB4)
_____ data (Answer IIA1)
_____ evaluation (Answer IB6)
_____ due process
_____ documentation of decision (Answer IID1)
_____ continuum (Answer IIB1)
_____ consent (Answer IIA2)
_____ other (Record) _____
_____

B2. Sequence of steps

1. specified _____
_____
2. mentioned
3. no mention
4. other _____

33. Placement Meetings

a) Number: 3. no mention
2. varies
1. ___ number

b) Name(s): _____
(record verbatim) _____
_____

c) Sequence: 3. no mention
2. specified _____
1. other

d) Time lapse: referral ⟶ assessment _____
assessment ⟶ placement mtg. _____
placement mtg. ⟶ placement _____

34. Participants

a) Types:
___ administration
↳ ___ building principal
___ director of special ed.
___ teacher
↳ ___ regular
___ special ed.
___ diagnostician
___ nurse
___ child, if appropriate
↳ "appropriate" defined?
1. yes _____
_____
2. no
3. other
___ parent required attendance?
↳ 1. yes
2. no
3. other
___ social worker
___ other
___ no participants specified

b) Any mention of inter-disciplinary teams?
1. yes
2. no
3. other

c) criteria for participation
___ knowledge of options
___ knowledge of child
___ knowledge of handicapping condition under consideration
___ other _____
___ no mention

35. Notification Procedures

a) for parents: 1. yes ⟶ Written?: 1. yes
2. no mention 2. no
3. other 3. no mention

b) for others: 1. yes ⟶ Written?: 1. yes
2. no 2. no
3. other 3. no mention

c) pre-meeting materials?
2. no mention
1. yes
↳ What are they? _____
↳ Who gets them? _____

36. Evaluation of placement

1. at least annually
2. semi-annually _____
3. more often _____
4. no mention

37. Miscellaneous Procedures

_____ to circulate meeting agenda
_____ to encourage parent participation
_____ to ensure informed consent
_____ to accommodate parent (bilingual services, etc.)
_____ to standardize decision process (checklists, etc.)
_____ to assist LEAs
_____ to ensure mainstreaming in extracurricular activities
_____ other _____

38. Responsibility for Final Decision Decision

a) placed in LEA: (private school/ State institution)
1. LEA
2. P.T.
3. State
4. Other _____
5. No mention

b) Placed outside LEA:
1. home LEA
2. receiving LEA
3. P.T.
4. State
5. receiving institution
6. other _____
7. no mention

C. Case Contingencies

a) By handicapping condition?

A1. _____
A2. _____
A3. _____
B1. _____
B2. _____
B3. _____
B4. _____
B5. _____
B6. _____
B7. _____
B8. _____

b) By type of decision (referral, reevaluation, etc.)?

A1. _____
A2. _____
A3. _____
B1. _____
B2. _____
B3. _____
B4. _____
B5. _____
B6. _____
B7. _____
B8. _____

II. DETERMINATION OF PLACEMENT

A. Information Availability

A1. Assessment Data

a) legality: 3. no mention
2. yes, legal minimum
→ ____ no single test
____ given in native language
____ non-discriminatory
____ not solely intelligence
____ other than achievement
1. yes, beyond law _____
_____

b) type: ____ assessment
____ adaptive behavior ratings
____ parent report
____ teacher report
____ cumulative record
____ other _____
_____
____ no mention

A2. Information Availability

(Code for a): 1 = yes
2 = no mention
3 = other)

a) consent: ____ for referral
____ for assessment
____ for placement
____ for change in placement
____ other _____
_____
____ no mention

b) Information for parent:
2. no mention
1. yes
→ what information?
____ their rights
____ results
____ due process proceedings
____ list of options
____ other _____
_____

When shared? _____
_____

How shared? _____
_____

c) For receiving teacher

2. no mention
1. yes
   → what information:
   ___ results of assessment
   ___ rationale for placement
   ___ other _____
   _____

When shared? _____
_____

How shared? _____
_____

d) With child

2. no mention
1. yes
   → at what age? _____
   what information?
   (record) _____
   _____

When shared? _____
_____

How shared? _____
_____

e) With others

2. no mention
1. yes
   → who? _____
   _____
   what information? _____
   _____

When shared? _____
_____

How shared? _____
_____

B. Consideration of Options

31. Consideration of options

a) Available options:

- ____ regular class - indirect
- ____ regular class - direct
- ____ regular class - resource room
- ____ self-contained - part time
- ____ self-contained - full time/regular school
- ____ self-contained - full time/special school
- ____ private day school
- ____ public residential
- ____ private residential
- ____ hospital
- ____ home bound
- ____ cascade system (with placement time limits)
- ____ extended diagnostic placement
- ____ other _____

b) Definition of options: 1. none 2. same as law 3. beyond law

c) Order of consideration: 1. Begin in regular school 2. Begin with special education 3. Other 4. No mention

d) Preference for regular placement: 1. No mention 2. Advocated, general 3. Advocated, specific

e) Provision of Continuum: 1. No mention 2. Advocated, general 3. Advocated, specific

f) Continuum within options: 1. No mention 2. Mentioned 3. Other _____

C. Criteria to Evaluate Options

32. Criteria (record numerical order given)

- ____ no mention
- ____ LRE (1)
- ____ appropriateness (2)
- ____ proximity (3)
- ____ IEP (4)
- ____ child's needs (5)
  - ___ medical (5a)
  - ___ educational (5b)
  - ___ social (5c)
  - ___ emotional (5d)
  - ___ vague (e.g., "unique," "individual") (5e)
  - ___ other (5f)
- ____ no harmful effects (6) → _____
- ____ quality of services (7) → _____
- ____ age (8)
- ____ handicapping condition (9)
- ____ availability (10)
- ____ cost (11)
- ____ present placement (12)

C1. (Continued)

____ stigma (13) → _____
____ transportation (14)
____ parent's preference (15)
____ impact on family (16)
____ long term effects (17)
____ extracurricular opportunities (18)
____ adaptive behavior (19)
____ other (20) (teacher/pupil attitudes, etc.)
_____
_____
_____

C2. Prohibited criteria

2. no mention
1. yes
→ (specify from codes above)
____ ____ ____ ____
→ other: _____
_____

C3. Determining LRE

a) Criteria: ____ % of time in mainstream
____ fewest limitations
____ normalization
____ proximity
____ other _____
____ no mention

b) Interaction with non-handicapped:
1. no mention
2. yes
→ Location: ____ in class
____ in building
____ off campus
____ other _____
____ no mention
→ Activity: ____ academic
____ extracurricular
____ lunch, recess, assembly
____ other _____
____ no mention

C4. Weighting of Criteria

2. no mention
1. yes
→ list above numbers in priority order given
____ ____ ____ ____ ____ ____ ____
record statement(s) verbatim _____
_____
_____

C5. Decision Rules

2. no mention
1. yes (record) _____
_____
_____

D. Placement Decision

D1. Documentation of Rationale for Decision

1. Required → for non-regular school ____
   → for all ____
2. Recommended → for non-regular school ____
   → for all ____
3. No mention
4. Other _____

D2. Criteria for Movement

1. No mention
2. Yes _____
3. Other _____

E. Evaluation of Decision

E1. Evaluation of Placement Decision to Determine if LRE Mandate has been Met

1. Yes → criteria required _____
   → how often
   1. more than once a year
   2. once a year
   3. less than once a year
   → responsible party
   1. teacher
   2. specialized representative
   3. evaluation team
   4. principal
2. No

F. Case Contingencies

a) by handicapping condition?

A1. _____
A2. _____
B1. _____
C1. _____
C2. _____
C3. _____
C4. _____
C5. _____
D1. _____
D2. _____
E1. _____

b) by type of decision (referral, evaluation?)

A1. _____
A2. _____
B1. _____
C1. _____
C2. _____
C3. _____
C4. _____
C5. _____
D1. _____
D2. _____
E1. _____

III. ANCILLARY ACTIVITIES

A. Training and T.A.

A1. Training and T.A. for LRE

3. no mention
2. yes ⟶ based on N.A.?: 1. yes 2. no 3. other
   ⟶ Kind? _____
   Frequency? _____
   Recipients? _____
1. other

B. Monitoring

B1. State Monitoring Procedures

a) Types:
1. Financial Audit
2. Upon Application for Funds
3. Periodic review
4. Other _____
5. No mention

b) Frequency: (Specify by type)
1. Once every 3 years ____
2. Once every 2 years ____
3. Annually ____
4. More than annually ____
5. Other ____
6. No mention ____

c) Focus:
____ assessment data
____ placement
____ meeting participants
____ options
____ evaluation procedures
____ documentation
____ no mention

d) Methods:
1. Written review
2. On-site visits
3. Combination
4. Other
5. Mention

e) Corrective actions:
____ expanding options
____ services to more children
____ improve quality of services
____ improve documentation
____ other
____ no mention

f) Correction:
____ training and T.A.
____ funds
____ added personnel
____ other
____ no mention

C. Reporting Procedures

C1. Documentation of Placement Meeting (not just decision in IEP)

1. Required ⟶ for all ____
   ⟶ for non-regular school ____
2. Recommended ⟶ for non-regular school ____
   ⟶ for all ____
3. No mention
4. Other _____

C2. Justification of Appropriate Environment

1. Required → for all ____
   → for non-regular school ____
2. Recommended → for all ____
   → for non-regular school ____
3. No mention
4. Other _____

C3. Assurances of Continuum of Services

1. Yes → How? _____
2. No mention
3. Other _____

D. Other Factors

D1. Incentives to Expand Options

a) Interagency agreements: 1. Detailed mention
2. General mention
3. No mention

b) Support from SEA: ____ T.A.
____ Manuals
____ Financial
____ Other _____

c) Coercion: ____ State law
____ LEA application
____ Financial
____ Other _____

IV. CONSTRAINTS

A. State Level

A1. Constraints

____ staff
→ ____ not enough at SEA level
____ not enough at LEA level
____ not qualified
____ other

____ attitudes
→ ____ parent
____ teacher
____ community
____ students
____ other

____ determining LRE
____ low incidence students
____ architectural barriers
____ materials
____ lack of options
→ which? _____

____ funding formula
____ not enough money
____ reporting requirements
→ ____ definitions of handicapping conditions
____ definitions of placement options

____ other

A2. Solutions

____ training, T.A.
____ funding
____ increased cooperation
____ changes in law
____ development of manuals, guidelines, etc.
____ other _____

Use the remaining space for any other comments, information, etc.

DATA SOURCES MATRIX

CATEGORY	APP								APP Appen.				M.D.	Memo.	PARs	Other	COMMENTS	SEARCH COMPLETE
	LRE	IEP	PPSC	PPS	AE	CI	PEP	OTHER	S.R.	A.H.	T.M.	OTHER						
I. A1.																		
A2.																		
A3.																		
B1.																		
B2.																		
B3.																		
B4.																		
B5.																		
B6.																		
B7.																		
B8.																		
C.																		
II. A1.																		
A2.																		
B1.																		
C1.																		
C2.																		
C3.																		
C4.																		
C5.																		
D1.																		
D2.																		
E1.																		
F.																		
III. A1.																		
B1.																		
C1.																		
C2.																		
C3.																		
D1.																		
IV. A1.																		
A2.																		

Key: PPSC • Participation of Private School Children
PPS • Placement in Private Schools
AE • Annual Evaluation
CI • Child Identification
PEP • Protection in Evaluation Procedure

S.R. • State Regulations
A.H. • Administrative Handbook
T.M. • Training Manuals
M.D. • Monitoring/Data Collection Forms
Memo. • Administrative Memoranda

DEFINITION OF CLASSIFICATION CRITERIA

I. STANDARD OPERATING PROCEDURES

A1. Policy Statement. States may set the tone and level of commitment to LRE by their own example. Thus, the stance a State has taken, as reflected by any State-level LRE policies, may be indicative of that State's understanding and commitment to the least restrictive doctrine. If States have developed an LRE policy statement(s), it will be cited from another source (if found in the APP). Such a statement should underscore the State's commitment to LRE, show an understanding of the concept, and indicate (imply) State authority to enforce the LRE doctrine. Citations from State laws, regulations, or administrative guidelines might qualify; memos, circulars, etc. of an informal nature should not be considered policy statements. Indicate "Yes" if such a statement exists. If so, determine whether the statement merely paraphrases the law or if it goes beyond. The relevant section of the law, with key phrases underlined, is given below for ease of comparison:

> "...to the maximum extent appropriate, handicapped children in public or private institutions or other care facilities, are educated with children who are not handicapped, and that special classes, separate school, or other removal of handicapped children from the regular educational environment occurs only when the nature or severity of the handicap is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily."

Since the underlined phrases are particularly ambiguous, more precise, concrete, or detailed references in these areas may be a clue to policy statements that go beyond the law. Another way to determine if States are merely paraphrasing, is to eliminate those words/phrases which parallel the law and then determine if any statement of substance is left. Finally, the State may elaborate upon aspects

of LRE in its policy statement -- such as continuum of services, normalization, or placement closest to home.

A2. Definition of LRE. A definition of LRE may or may not be contained in a policy statement. Any elaboration on least restrictive environment may be considered as a definition of LRE, and more than one component is likely. Thus, record the order in which the various facets of LRE are mentioned (percent of time in mainstream, fewest limitations, etc.). If "most appropriate" is used, try to determine the State's definition of appropriate.

A3. LEA Policy Statement. SEAs may require their LEAs to submit a policy statement on LRE when applying for funds, submitting an LEA application or plan, or at some other time. If mention is made of this, indicate whether the statement is required or recommended. Statements such as "certification of all assurances specified by the law is required" are too ambiguous and should not be counted as an LEA policy statement on LRE; mark "other" and indicate "global".

B1. Formalized Procedures. Provisions for certain placement procedures are required by law, others are not. Begin by marking any placement procedures required/recommended by the State. If all are mentioned as components of the placement process, circle "Yes;" otherwise indicate "Partial," unless no mention of any of the listed placement procedures is made. These procedures refer to components of the placement process except the placement decision itself. Many of these same procedural components are examined in more detail in other sections. If any of the procedures are checked, be sure to answer the referenced sections.

B2. Sequence of Steps. Indicate if a State has a structured procedure (from identification through re-evaluation of a handicapped child) for the special education process that applies to their LEAs. This information may be narrative or may be in the form of a diagram or flow chart. Record, if the sequence if specified, how placement fits into this process (e.g., "parents must approve IEP before child is placed").

B3. Placement Meetings. LEAs vary in the number and kinds of meetings held to determine the placement of a particular child. There may be a pre-placement meeting (with or without the parent(s)), a separate placement meeting, or the decision may be officially made during an IEP meeting. If the State specifies only one or more than one meeting, write the number in the appropriate blank. Do not assume that if one committee is responsible that there is only one meeting; use the "no mention" category for these instances. If the State overtly says that there is variation in the number of meetings, mark "varies." Record the name of the committee/group/team that determines placement, if this is given. If a particular sequence of meetings is indicated ("the IEP team makes recommendations and these are reviewed by the placement team"), note this and record the sequence outlined. Note also the elapsed time allowed between referral, assessment, placement meeting, and placement, if specified.

B4. Participants. Many different types of persons may attend placement meetings, and the State may or may not specify for LEAs those, at a minimum, who should attend. Indicate any placement meeting participants named by the State. If placement is determined during the IEP meeting, the following persons are required, by law, to attend: a representative of the education agency, the child's teacher(s), parent(s), and the child (if appropriate). When a State specifies that the placement decision is made during the IEP meeting or by the IEP committee, check the above responses and refer to the IEP section (if reviewing APP) for any other required participants and mark accordingly. [Note: this does not apply if placement is "determined on the basis" of the IEP. If this statement occurs with no other information on meeting participants, consider participants unspecified.] If an interdisciplinary team is specifically mentioned or obviously alluded to ("psychologists, nurse, and a medical doctor"), indicate this accordingly. Use the "other" response for uncertain or ambiguous references. Check appropriate responses under "criteria for participation" if the State elaborates upon participant types or, rather than using titles, refers to the qualifications of meeting participants.

B5. Notification Procedures. Indicate if the LEAs have procedures outlined by the State for notification of parents and others about the placement meeting and if this notification must be in writing. A statement such as: "parents must be notified one week before the placement meeting for their child" would be coded with "Yes" by parents, but "Written" would be answered by "no mention." Record also if any pre-meeting materials (such as diagnostic results, list of options, recommendations of IEP team) are routinely distributed, and if so, what types of materials and who receives them.

B6. Evaluation of Placement. How often do States require LEAs to evaluate the placement of a child? If twice-a-year is the response, circle "semi-annually" and indicate "2 x/yr." next to that option.

B7. Miscellaneous Procedures. Check those that apply.

B8. Responsibility for Final Decision. For those students placed in private schools or State institutions in the home LEA, code the party ultimately responsible for that placement. Similarly, for students placed outside of the home LEA, indicate who is responsible for that placement.

C. Case Contingencies. If any of the above categories (A1 through B8) vary according to the handicapping condition of the student under consideration, specify the nature of the variation on the appropriate line (B5. for Notification Procedures, etc.). Similarly, if the State indicates variations in Standard Operating Procedures by the type of decision to be made (anything other than initial placement; e.g., annual re-evaluation, referral for change in placement) specify this as explained above.

II. DETERMINATION OF PLACEMENT

A. Information Availability

A1. Assessment Data. Mark any of the legal criteria for non-discriminatory testing required by the State. If more than these criteria are indicated, circle "beyond law" and specify what other assessment data requirements are mentioned (e.g., coordinated review of several data sources, including formal assessments, teacher

anecdotal records, and third party validation [parents]). Check also the type of assessment data to be used in determining placement.

A2. Information Availability. Under "consent", mark any of the junctures in the special education process which must have parental consent (e.g., "assessment data on a child may not be collected or records requested unless parents have given prior written consent."). For parents, teachers, the child, or others, indicate if States require that certain information be shared, what that information is, when it should be shared (prior to/during/after meeting), and how it should be shared (written, verbal). "Information" refers to any placement-related information other than notification of the meeting and of the actual decision made.

B. Consideration of Options

B1. Consideration of Options. The law states that a continuum of services must be available for placement. All but two of the options listed are those given and defined (p. 2-3, second section) in the regulations. Check those found in the text of the document, and fill in any others that might appear in Table 4 of the LRE section of the APP. Note any vacancies for a particular handicapping condition (e.g., no regular class with direct services for the deaf).

Indicate if the options above are defined/described. Refer to the regulations (page previously indicated), for official definitions of placement options. A State that goes "beyond the law"in its description would provide some guidelines for determining appropriate placement in that setting as part of the definition (e.g., most children with mild behavioral problems can be adequately served in this setting).

The order in which the options are to be considered may also affect placement. If handicapped children are automatically assigned (either mentally or in practice) to special education classes and then "appropriate" placement is decided, this may affect their likelihood of remaining in the initial setting to which they were assigned (i.e., a more restrictive environment). Therefore, if the

State either implicitly or explicitly indicates the order that placement options should be considered, show this by circling the applicable response.

The thrust with which the State shows a preference for regular school placement may also affect implementation of LRE. Indicate whether the State shows a preference for regular placement. The option "Advocated, specific" would be used when the State requires resource rooms and special classes to be housed in regular schools, indicates that regular placement should take precedence over some other placement consideration (e.g., handicapping condition or age) or shows a strong commitment to the removal of architectural barriers or the acquisition of supplementary special education personnel in the schools.

A statement reaffirming the provision of a continuum of services or indicating that LEAs are required to provide assurances of this would be coded as "Advocated, general" under the category, "Provision of continuum of services." Stronger advocacy, with specifics for implementation, would be found for those States that promote interagency agreements to accomplish this, that indicate the provision of T. and T.A. to LEAs in this area, or who indicate financial aid to LEAs for the expansion of placement options. Within any one option there can also be a continuum. Thus, the amount of time a handicapped child spends outside of a special class and in the regular class, for example, can vary along the most-to-least restrictive continuum. If a State addresses this concept, indicate this accordingly.

C. Criteria to Evaluate Options

C1. Criteria. A number of different criteria may be considered in determining placement. Indicate the order in which any of the listed possibilities are mentioned as considerations in determining placement. Under "child's needs," indicate the order of the subcategories alphabetically. Thus, if the third criterion mentioned by a State was "placement must be based on the child's educational and emotional needs," the coding would be: '3' by "child's needs," 'a' by

"educational," and 'b' by "emotional." If the responses "no harmful effects, quality of services, or stigma" are found, record any definition of these terms. If no definition or elaboration on these concepts is present, write "no definition" on the line. By "adaptive behavior" is meant disruptiveness or potential for successful interactions with non-handicapped peers.

C2. Prohibited Criteria. The State may also prohibit LEAs from using certain criteria to determine placement (e.g., "cost of placement to the LEA shall not be a consideration when determining placement"). If so, indicate which criteria are prohibited; use the code number assigned to the criteria listed in Category C1. above (e.g., cost = 11; transportation = 14). If any criteria other than those listed above are prohibited, record these on the lines for "other."

C3. Determining LRE. If the State indicates guidance given to LEAs in determining placement, check any of the criteria they indicate should be used to determine LRE. Show also if the State addresses interaction with non-handicapped peers by location of the interaction (in class, off-campus) or by the type of activity (extracurricular, academic).

C4. Weighting of Criteria. Some factors may outweigh others when deciding upon the placement of a child. If a State gives any guidelines for the relative importance of particular criteria, record these using the pre-assigned codes from category C1 (1 for restrictiveness, 2 for appropriateness, etc.), and record the statement(s) verbatim. An example might be: "opportunities for exposure to non-handicapped children should take precedence over the assignment of a child to the school nearest home, if that school does not offer the needed exposure for that child."

C5. Decision Rules. If the State gives decision rules for determining placement (e.g., "TMR students should be assigned to the State school for the mentally retarded"), record these verbatim.

D. Placement Decision

D1. Documentation of Rationale for Decision. Whether or not the proceedings of the placement meeting are to be recorded, a rationale for the final decision may be required/recommended. If so, determine whether this documentation is required or recommended, and if so, if it is necessarily a part of the permanent record when a child is placed outside of the regular school or if it applies to all handicapped children.

D2. Criteria for Movement. Once the child has been placed, record any criteria given by the State for determining change in placement (teacher report, test scores, behavior). Note if the criteria are different depending on the direction of movement (toward more restrictive; toward less restrictive) and if specific criteria (e.g., achievement at a specified level, mastery of particular skills) against which to match a student's progress are specified at the time of placement (in the IEP, placement meeting document, etc.).

E. Evaluation of Decision

E1. Evaluation of Placement for LRE. Indicate whether the State requires LEAs to evaluate placement decisions for adherence to the least restrictive doctrine. This evaluation is above and beyond the (re-) evaluation (usually annual) of each child's placement, and refers to some systematic evaluation of the decision rather than the appropriateness of the placement. If this occurs, note the criteria used by the LEA and/or required by the SEA and the frequency with which this evaluation occurs. Note also the party who is responsible for evaluating the decision, if specified.

F. Case Contingencies. Record variations in any of the categories by handicapping condition and type of decision, as explained in IC.

III. ANCILLARY ACTIVITIES

A. Training and Technical Assistance

A1. Training and T.A. for LRE. If the State indicates having conducted training sessions or providing technical assistance in the

area of LRE, mark the "yes" response. This T/T.A. should have already been done, not merely planned for. Show also if T/T.A. was based on the results of a needs assessment ("N.A." = needs assessment), what kind(s) was provided (workshop, classes), how often the State has provided this activity, and who received T/T.A. (regular teachers, building principals, etc.).

B. Monitoring

B1. State Monitoring Procedures. Indicate the type(s) of State monitoring described by the State. More than one type may be circled. Circle the frequency with which the State conducts monitoring for each type of monitoring described. Fill in the type on the line to the right of the frequency codes. Thus, if the State conducts "periodic reviews" every three years and monitors LEAs yearly upon their application for funds, these would be coded as indicated above.

Check also the focus of State monitoring; if they are checking to be sure the assessment data are appropriate, if the placement decisions are appropriate, if the necessary meeting participants are in attendance (especially if parents are involved), if the LEA provides a full range of options, if the LEA's own evaluation procedures are adequate, if the LEA has the required documentation, or if no monitoring or no focus of monitoring is given. Note also the method by which the State monitors its LEAs: review of written reports/documents/statistics; on-site visits; or a combination thereof.

Check any corrective actions which the States have required of LEAs as a result of their monitoring, and indicate the activities undertaken to correct the situation.

C. Reporting Procedures

C1. Documentation of Placement Meeting. In addition to the written record contained in the IEP concerning percent of time the child will be in the mainstream, some States may require/suggest written documentation of the placement meeting. Indicate whether this is

required or recommended, and if it applies to placement meetings for all handicapped children, or only for those that are placed outside of the regular school.

C2. Justification of Appropriate Environment. Does the State require/recommend that LEAs furnish written justification that the placement is the most appropriate one? Same options as above.

C3. Assurances of Continuum of Services. If the LEAs are required to show that they offer a continuum of placement settings, indicate this accordingly.

D. Other Factors

D1. Incentives to Expand Options. If the State generally mentions interagency agreements ("LEAs are encouraged to expand available options by forming interagency agreements") code "General mention." If, however, the State goes into detail about the types and provisions for interagency agreements (i.e., gives an indication that these agreements are frequent enough to be somewhat standardized) mark "Detailed mention."

Check any SEA support (T.A., manuals, financial) mentioned to encourage the expansion of placement options and any deterrants (law, application, financial) to limited options. "Financial" in the first instance refers to funding above and beyond normal LEA funds for the expressed purpose of expanding options. In the second instance, "financial" refers to the withdrawal or cutting back of monies which LEAs would normally be entitled to but which are curtailed because the LEA is not proving a continuum of services.

IV. CONSTRAINTS

A. State Level

A1. Constraints and A2. Solutions. Check all options that apply. Record any solutions which appear to be unusual or particularly creative.

Record any additional comments, information in the remaining space.

APPENDIX B:

Tables

LRE Policy Statement

TABLE B-1: STATES LRE POLICY STATEMENTS.

Policy Statements	Percent of Total
1. No Statement Cited	20.0 (n=10)
2. Statement Cited	78.0 (n=39)
• Same as the Law	58.0 (n=29)
• Beyond the Law	16.0 (n= 8)
• Statement Alluded to, not Explicit	4.0 (n= 2)
3. Statement Indirectly Related to State Policy	2.0 (n= 1)
TOTAL	100.0 (N=50)

TABLE B-1a: STATE GUIDANCE CONCERNING LEA POLICY STATEMENTS ON LRE.

State Posture	Percent of Total
1. No Mention	56.0 (n=28)
2. Recommended	6.0 (n= 3)
3. Required	28.0 (n=14)
4. Other	10.0 (n= 5)
TOTAL	100.0 (N=50)

TABLE B-2: STATE DEFINITIONS OF LRE.

State LRE Definitions	Percent of Total
1. No Definition	60.0 (n=30)
2. States Defining LRE	40.0 (n=20)
Specific Definitions	Frequency*
• Normalization	8.0 (n= 4)
• Mainstreaming	26.0 (n=13)
• Most "Appropriate" Placement	8.0 (n= 4)
• Other	12.0 (n= 6)
TOTAL	100.0 (N=50)

*Multiple responses were allowed.

TABLE B-3: DESCRIPTION OF PLACEMENT PROCESS SEQUENCE OF STEPS.

Level of Detail	Percent of Total
1. Sequence Specified	44.0 (n=22)
2. Sequence Only Mentioned	12.0 (n= 6)
3. Sequence Not Mentioned	44.0 (n=22)
TOTAL	100.0 (N=50)

TABLE B-4 : NUMBER OF PLACEMENT MEETINGS PER CASE.

Number of Meetings	Percent of Total
1. Number Specified	4.0 (n= 2)
2. Number Varied	8.0 (n= 4)
3. Number Not Mentioned	88.0 (n=44)
TOTAL	100.0 (N=50)

TABLE B-5: SEQUENCE OF PLACEMENT MEETINGS.

Level of Detail	Percent of Total
1. Specified	26.0 (n=13)
2. Implied	2.0 (n= 1)
3. Not Mentioned	72.0 (n=36)
TOTAL	100.0 (N=50)

TABLE B-6: NAMES OF MEETINGS CONCERNED WITH PLACEMENT

Functional Category	Name	Frequency*
Placement	Eligibility and Placement Staffing Committee	n= 2
	Placement Team	n= 2
	Special Education Placement Committee	n= 1
	Placement Committee	n= 2
	Administrative Placement Committee	n= 1
	Program Placement Conference	n= 1
	Special Education Placement Advisory Committee	n= 1
	Planning and Placement	
	Planning and Placement Team	n= 1
	Educational Planning and Placement	n= 1
SUBTOTAL		N=14
Evaluation/ Assessment	Evaluation Conference	n= 1
	Educational Assessment Service Teams	n= 1
	Assessment Team	n= 1
	School Appraisal Team	n= 1
	Diagnostic and Educational Team	n= 1
	Evaluation Team	n= 1
	Care Evaluation Team	n= 2
	Pupil Evaluation Team	n= 1
SUBTOTAL		N= 9
Evaluation and Planning	Evaluation and Planning Team	N= 1
Planning	Planning Conference	n= 4
	Diagnostic and Planning Team	n= 1
	Educational Program Planning Team	n= 1
SUBTOTAL		N= 6

Multidisi-plinary	Multidisciplinary Conference	n= 1
	Multidisciplinary Team Meeting	n= 1
	Multidisciplinary Team	n= 1
	Multidisciplinary Diagnostic/Assessment Team	n= 1
	Multidisciplinary Staffing Conference	n= 2
SUBTOTAL		N= 6
Child Study	Child Study Team	n= 4
	Basic Child Study Team	n= 1
	Child Study Committee	n= 1
	Child Study IPRO	n= 1
SUBTOTAL		N= 7
Staffing	Staffing Committee	n= 3
	Staffing Conference	n= 1
	Basic Staffing Team	n= 1
SUBTOTAL		N= 5
IEP	IEP Conference Planning Committee	n= 2
	IEP Committee	n= 1
	IEP Conference	n= 1
	IEP Development Conference	n= 1
SUBTOTAL		N= 5
Admission	Admission, Review and Dismissal Committee	n= 3
	Admission and Release Committee	n= 1
SUBTOTAL		N= 4
Miscellaneous	Joint Screening Team	n= 1
	Case Conference Committee	n= 1
	Committee on the Handicapped	n= 1
	Local Survey Team	n= 1
	Regional Screening Team	n= 1
SUBTOTAL		N= 5
No Name Mentioned		N= 2
TOTAL		N=64

TABLE B-7 TIME LAPSE BETWEEN STEPS IN THE PLACEMENT PROCESS

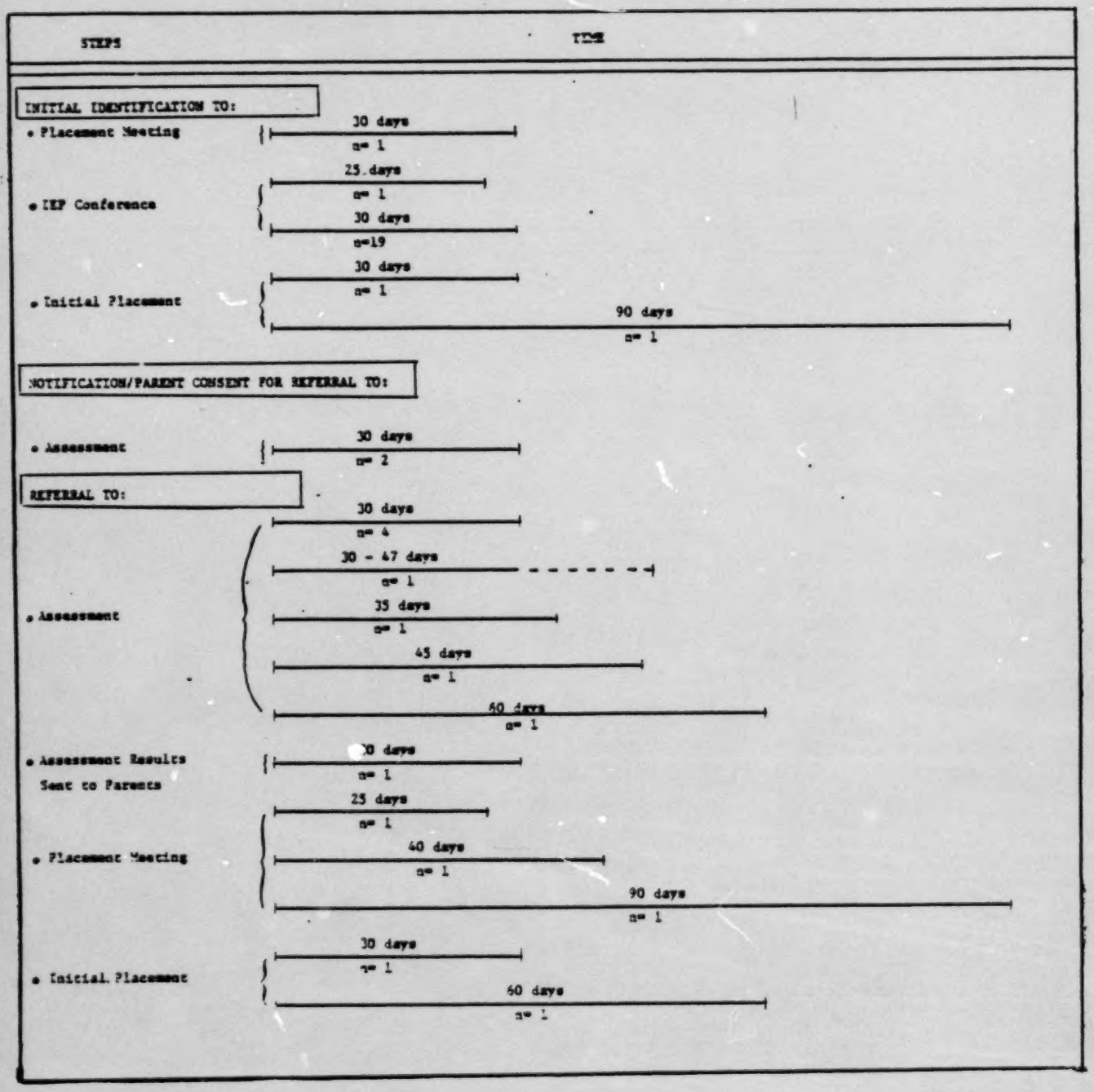
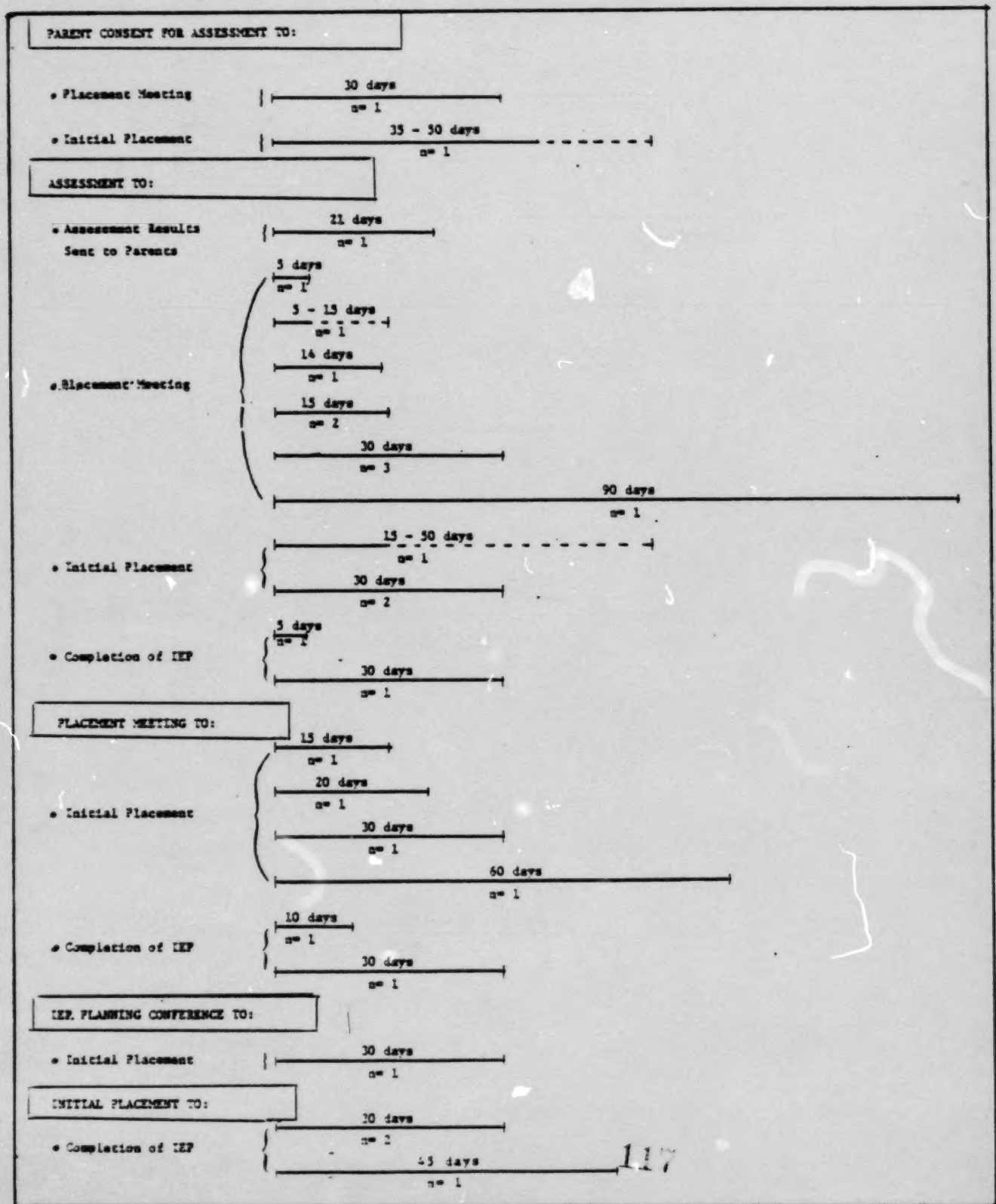


TABLE B-7: (Continued)



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Placement Team Participation

TABLE 8-8 : INTERDISCIPLINARY TEAM INVOLVEMENT.

Mention of Interdisciplinary Team	Percent of Total
1. Explicitly Mentioned	32.0 (n=16)
2. Implied	8.0 (n= 4)
3. Not Mentioned	60.0 (n=30)
TOTAL	100.0 (N=50)

TABLE B-9 : CRITERIA FOR TEAM PARTICIPATION.

Criteria		Frequency*
1.	Knowledge of Child	58.0 (n=29)
2.	Knowledge of Options	48.0 (n=24)
3.	Knowledge of Handicapping Condition Under Consideration	16.0 (n= 8)
4.	Other (Meaning of Evaluation Results, Knowledge of Personnel, Same Racial Group)	66.0 (n=33)
5.	No Mention	20.0 (n=10)

*Multiple responses were allowed.

TABLE B-10: PLACEMENT TEAM PARTICIPANTS.

Type		Frequency*
1.	Administration (Specified and Unspecified)	88.0 (n=44)
	Specified Administrators	Frequency*
	• Building Principal	30.0 (n=15)
	• Director of Special Education	44.0 (n=22)
2.	Teacher (Specified and Unspecified)	88.0 (n=44)
	Specified Teachers	Frequency*
	• Regular Education	50.0 (n=25)
	• Special Education	50.0 (n=25)
3.	Diagnostician	58.0 (n=29)
4.	Nurse	32.0 (n=16)
5.	Child, if Appropriate	58.0 (n=29)
6.	Parents	78.0 (n=39)
7.	Social Worker	32.0 (n=16)
8.	Other	88.0 (n=44)
9.	No Participants Specified	8.0 (n= 4)

*Multiple responses were allowed.

TABLE B-11: PARENT PARTICIPATION IN PLACEMENT MEETINGS.

Attendance Policy	Percent of Total
1. Parent Attendence is Required	12.0 (n= 6)
2. Parent Attendance is Not Required	40.0 (n=20)
3. Attendance Policy is Unclear	26.0 (n=13)
4. Parent is Not Specified as a Placement Team Participant	22.0 (n=11)
TOTAL	100.0 (N=50)

Formalized Placement Meeting Procedures

TABLE B-12: NOTIFICATION PROCEDURES.

Specifications	Frequency*
1. Written Notice for Parents	100.0 (n=50)
2. Procedures to Notify Others	0.0 (n= 0)
3. Preparation of Pre-Meeting Materials	4.0 (n= 2)

*Multiple responses were allowed.

TABLE B-13: EVALUATION OF PLACEMENT.

How Often	Percent of Total
1. At Least Annually	86.0 (n=43)
2. Semi-Annually	6.0 (n= 3)
3. More Often Than Semi-Annually	8.0 (n= 4)
TOTAL	100.0 (N=50)

TABLE B-14: MISCELLANEOUS PROCEDURES.

Specific Procedures	Frequency*
1. Encouraging Parent Participation	30.0 (n=15)
2. Ensuring Informed Consent	26.0 (n=13)
3. Accomodating Parent (Bilingual Services, etc.)	58.0 (n=29)
4. Standardizing Decision Process (Checklists, etc.)	14.0 (n= 7)
5. Assisting LEAs	6.0 (n= 3)
6. Ensuring Mainstreaming In Extracurricular Activities	2.0 (n= 1)
7. Other	4.0 (n= 2)

*Multiple responses were allowed.

TABLE B-15: RESPONSIBILITY FOR FINAL PLACEMENT DECISION.

Responsible Party	Frequency*
1. Private School/State Institutional Placements Within the LEA	
• LEA	84.0 (n=42)
• State	12.0 (n= 6)
• Other (e.g. Joint Decision)	8.0 (n= 4)
• No Mention	6.0 (n= 3)
2. Placement Outside the LEA	
• Home LEA	76.0 (n=38)
• Receiving LEA	2.0 (n= 1)
• State	10.0 (n= 5)
• Receiving Institution	2.0 (n= 1)
• Other (e.g. Joint Decision)	4.0 (n= 2)
• No Mention	16.0 (n= 8)

*Multiple responses were allowed.

TABLE B-16: EVALUATION SAFEGUARDS.

Safeguards		Percent of Total
1.	No Mention of Safeguards	2.0 (n= 1)
2.	Safeguards Mentioned	98.0 (n=49)
	Specific Safeguards	Frequency*
	• No Single Test	82.0 (n=41)
	• Given In Native Language	90.0 (n=45)
	• Non-Discriminatory Testing	84.0 (n=42)
	• Not Solely Intelligence	70.0 (n=35)
	• Tests Other Than Achievement	52.0 (n=26)
	• Other Safeguards Not Required by Law	6.0 (n= 3)
	TOTAL	100.0 (N=50)

*Multiple responses were allowed.

TABLE B-17: TYPE OF ASSESSMENT DATA.

Type		Frequency*
1.	Assessment	66.0 (n=33)
2.	Adaptive Behavior Ratings	72.0 (n=36)
3.	Parent Report	66.0 (n=33)
4.	Teacher Report	70.0 (n=35)
5.	Cumulative Record	72.0 (n=36)
6.	Other (e.g. Medical Reports)	44.0 (n=22)

*Multiple responses were allowed.

TABLE B-18: PARENTAL CONSENT REQUIREMENTS.

Procedures	Percent Responding: Consent Required	Other (e.g. Notification) only	No Mention	Total % of Row
1. Referral	—	12.0 (n= 6)	88.0 (n=44)	100.0 (N=50)
2. Assessments	96.0 (n=48)	4.0 (n= 2)	—	100.0 (N=50)
3. Placement	72.0 (n=36)	18.0 (n= 9)	10.0 (n= 5)	100.0 (N=50)
4. Change In Placement	30.0 (n=15)	32.0 (n=16)	38.0 (n=19)	100.0 (N=50)

TABLE B-19: AVAILABILITY OF INFORMATION FOR PARENT.

Information Required	Frequency*
1. Parent Rights	100.0 (n=50)
2. Results	92.0 (n=42)
3. Due Process Procedures	100.0 (n=50)
4. List of Options	70.0 (n=35)
5. Other (Actions Proposed, Reasons, Options Rejected)	78.0 (n=39)

*Multiple responses were allowed.

TABLE B-20: INFORMATION SHARING.

Information Shared With:	Frequency*
1. The Receiving Teacher	8.0 (n= 4)
2. The Child	26.0 (n=13)
3. Others	4.0 (n= 2)

*Multiple responses were allowed.

TABLE B-21: USE OF PLACEMENT OPTIONS.

Frequency* of Reported Grouped Data	Placement Options Used In States	Frequency* of Reported Specific Data
54.0 (n=27)	Regular Class - Indirect	36.0 (n=18)
	Regular Class - Direct	40.0 (n=20)
	Regular Class - Resource Room	40.0 (n=20)
54.0 (n=27)	Self - Contained - Part Time	40.0 (n=20)
	Self - Contained - Full Time/ Regular School	44.0 (n=22)
	Self - Contained - Full Time/ Special School	42.0 (n=21)
48.0 (n=24)	Private Day School	38.0 (n=19)
	Public Residential	44.0 (n=22)
	Private Residential	32.0 (n=18)
50.0 (n=25)	Hospital	36.0 (n=18)
	Home Bound	42.0 (n=21)
	Cascade System	2.0 (n= 1)
	Extended Diagnostic Placement	6.0 (n= 3)
	Other (Group Homes, Reverse Mainstreaming, Voc/Adult Educ.)	22.0 (n=11)

*Multiple responses were allowed.

TABLE B-22: STATE DEFINITIONS OF PLACEMENT OPTIONS

Definition	Percent of Total
1. No Mention	28.0 (n=14)
2. Same as Law	18.0 (n= 9)
3. Beyond the Law	30.0 (n=15)
4. Different From the Law	24.0 (n=12)
TOTAL	100.0 (N=50)

TABLE B-23: STATE INDICATION OF ORDER IN WHICH TO CONSIDER OPTIONS

Order	Percent of Total
1. Begin in Regular School	36.0 (n=18)
2. Begin with Special Education	0.0 (n= 0)
3. Other	16.0 (n= 8)
4. No Mention	48.0 (n=24)
TOTAL	100.0 (N=50)

TABLE B-24: STATE ADVOCACY OF REGULAR PLACEMENT AND CONTINUUM.

Level of Advocacy	Preference for Regular Placement	Provision of Continuum
1. Generally Advocated	52.0 (n=26)	34.0 (n=17)
2. Specifically Advocated	34.0 (n=17)	62.0 (n=36)
3. No Mention	14.0 (n= 7)	4.0 (n= 2)
TOTAL	100.0 (N=50)	100.0 (N=50)

TABLE B-25: CONCEPT OF CONTINUUM WITHIN OPTIONS.

Response	Percent of Total
1. No Mention	88.0 (n=44)
2. Mentioned	2.0 (n= 1)
3. Implied, but not explicit	10.0 (n= 5)
TOTAL	100.0 (N=50)

TABLE B-26: LEA ASSURANCES OF CONTINUUM REQUIRED BY STATES

Response	Percent of Total
Assurances Required	68.0 (n=34)
No Mention	20.0 (n=10)
Assurances Implied, Not Explicit	12.0 (n= 6)
TOTAL	100.0 (N=50)

TABLE B-27: EVALUATION OF OPTIONS.

Criteria Mentioned	Frequency*
1. LRE	54.0 (n=27)
2. Proximity	50.0 (n=25)
3. No Harmful Effects	46.0 (n=23)
4. Quality of Services	42.0 (n=21)
5. Child's Needs[1/]	50.0 (n=25)
6. IEP	48.0 (n=24)

[1/] For the most part child's needs were unspecified or vague (n-19). Those states that did specify needs listed educational needs (n=7), medical needs (n=3), social needs (n=1), and emotional needs (n=1).

*Multiple responses were allowed.

TABLE B-28: CRITERIA USED IN DETERMINING LRE.

Criteria	Frequency*
1. Time in Mainstream	8.0 (n= 4)
2. Fewest Limitations	2.0 (n= 1)
3. Normalization	2.0 (n= 1)
4. Proximity	4.0 (n= 2)
5. Other (Quality Services, No Harmful Affects, Most Appropriate)	20.0 (n=10)
6. Not Mentioned	74.0 (n=37)

*Multiple responses were allowed.

TABLE B-28a: PLACEMENT CONSIDERATIONS.

Considerations	Specified	Not Mentioned	Total % of Row
1. Prohibited Criteria	24.0 (n=12)	76.0 (n=38)	100.0 (n=50)
2. Weighted Criteria	14.0 (n= 7)	86.0 (n=43)	100.0 (N=50)
3. Decision Rules	26.0 (n=13)	74.0 (n=37)	100.0 (N=50)
4. Movement Criteria	80.0 (n=40)	16.0 (n= 8)	96.0[1/] (N=48)

[1/] Two states alluded to, but did not specify criteria for movement to a less restrictive environment.

TABLE B-29: INTERACTION WITH NON-HANDICAPPED

Interaction		Percent of Total
1.	Not Mentioned	22.0 (n=11)
2.	Mentioned	78.0 (n=39)
	Location	Frequency*
	• In Class	24.0 (n=12)
	• In Building	34.0 (n=17)
	• Off Campus	4.0 (n= 2)
	• Not Mentioned	40.0 (n=20)
	Activity	Frequency*
	• Academic	24.0 (n=12)
	• Extra Curricular	24.0 (n=12)
	• Lunch, Recess, Assembly	16.0 (n= 8)
	• Other	22.0 (n=11)
	• Not Mentioned	38.0 (n=19)
	TOTAL	100.0 (N=50)

*Multiple responses were allowed.

TABLE B-30: EVALUATION OF PLACEMENT TO DETERMINE IF LRE MANDATE HAS BEEN MET.

Placement Evaluation	Percent of Total
1. Not Mentioned	78.0 (n=39)
2. Alluded to, Not Specified	4.0 (n= 2)
3. Specified	18.0 (n= 9)
How Often Conducted	Frequency
• More than once a year	2.0 (n= 1)
• Once a year	12.0 (n= 6)
• Less than once a year	0.0 (n= 0)
TOTAL	100.0 (N=50)

TABLE B-31: TRAINING AND TECHNICAL ASSISTANCE FOR LRE.

Training and Training Assistant		Percent of Total
1.	Not Mentioned	12.0 (n= 6)
2.	Alluded to, Not Specified	2.0 (n= 1)
3.	Specified	86.0 (n=43)
	Based on Needs Assessment	Frequency
	• Yes	30.0 (n=15)
	• No Mention	28.0 (n=14)
	• Alluded to, Not Specified	28.0 (n=14)
	TOTAL	100.0 (N=50)

TABLE B-32: STATE MONITORING PROCEDURES.

Type	Frequency*	How Often					
		Once Every 3 years	Once Every 2 years	Annually	More Than Annually	Other	No Mention
1. Financial Audit	24.0 (n=12)	4.0 (n= 2)	-	8.0 (n= 4)	-	2.0 (n= 1)	8.0 (n= 4)
2. Upon Application For Funds	26.0 (n=13)	-	-	14.0 (n= 7)	-	-	6.0 (n= 3)
3. Periodic Review	90.0 (n=45)	18.0 (n= 9)	2.0 (n= 1)	44.0 (n=22)	6.0 (n= 3)	10.0 (n= 5)	14.0 (N= 7)
4. Other	30.0 (n=15)	-	-	20.0 (n=10)	2.0 (n= 1)	4.0 (n= 2)	2.0 (n= 1)
5. No Mention	2.0 (n= 1)	-	-	-	-	-	2.0 (n= 1)

*Multiple responses were allowed.

TABLE B-33: METHODS OF STATE MONITORING

Methods	Percent of Total
1. Written Review	2.0 (n= 1)
2. On-Site Visits	4.0 (n= 2)
3. Combination	84.0 (n=42)
4. Other	6.0 (n= 3)
5. Not Mentioned	4.0 (n= 2)
TOTAL	100.0 (N=50)

TABLE B-34: CORRECTIVE ACTIONS

Actions	Frequency*
1. Expanding Options	4.0 (n= 2)
2. Improve Quality of Services	2.0 (n= 1)
3. Other	4.0 (n= 2)

*Multiple responses were allowed.

TABLE B-35: STATE METHODS TO IMPLEMENT CORRECTIVE ACTIONS.

Methods	Frequencies*
1. Training and Technical Assistance	54.0 (n=27)
2. Funds	14.0 (n= 7)
3. Additional Personnel	0.0 (n= 0)
4. Other	22.0 (n=11)
5. No Mention	30.0 (n=15)

*Multiple responses were allowed.

TABLE B-36 ADDITIONAL PLACEMENT DECISION CONSIDERATIONS.

Activity	Required		Recommended		No Mentioned	Other	Total % of Row
	Reg[1]	Non-Reg[2]	Reg[3]	Non-Reg[4]			
1. Documentation of Rationale for Decision	84.0 (n=42)	2.0 (n= 1)	-	-	14.0 (n= 7)	-	100.0 (N=50)
2. Documentation of Placement Meeting	62.0 (n=31)	-	2.0 (n= 1)	-	32.0 (n=16)	4.0 (n= 2)	100.0 (N=50)
3. Justification of Appropriate Environment	58.0 (n=29)	-	2.0 (n= 1)	-	40.0 (n=20)	-	100.0 (N=50)

[1] Required for all special education students.

[2] Required for special education students attending non-regular education schools.

[3] Recommended for all special education students.

[4] Recommended for special education students attending non-regular education schools.

TABLE B-37 : INCENTIVES TO EXPAND OPTIONS.

Incentive	Frequency*
1. Interagency Agreements	
• Mentioned in Detail	58.0 (n=29)
• Generally Mentioned	30.0 (n=15)
• Not Mentioned	12.0 (n= 6)
2. Support From SEA	
• Technical Assistance	66.0 (n=33)
• Manuals	12.0 (n= 6)
• Financial	18.0 (n= 9)
• Other	8.0 (n= 4)
3. Coercion	
• State Law	66.0 (n=33)
• LEA Application	32.0 (n=16)
• Financial	26.0 (n=13)
• Other	8.0 (n= 4)

*Multiple responses were allowed.

TABLE:B-38: STATE LEVEL CONTRAINTS

Constraints	Frequency*
1. Staff	38.0 (n=19)
Staff Constraints	Frequency*
• Not Enough at SEA Level	2.0 (n= 1)
• Not enough at LEA Level	12.0 (n= 6)
• Not Qualified	28.0 (n=14)
• Other	4.0 (n= 2)
2. Attitudes	20.0 (n=10)
Attitudinal Constraints	Frequency*
• Parents	8.0 (n= 4)
• Teacher	12.0 (n= 6)
• Community	2.0 (n= 1)
• Students	4.0 (n= 2)
• Other	8.0 (n= 4)
3. Determing LRE	6.0 (n= 3)
4. Low Incidence Students	26.0 (n=13)
5. Architectual Barriers	6.0 (n= 3)
6. Materials	4.0 (n= 2)
7. Lack of Options	32.0 (n=16)
8. Funding Formula	2.0 (n= 1)
9. Not Enough Money	32.0 (n=16)

*Multiple responses were allowed.

TABLE B-39: STATE SOLUTIONS TO CONSTRAINTS

Solution		Frequency*
1.	Training and Technical Assistance	28.0 (n=14)
2.	Funding	12.0 (n= 6)
3.	Increased Cooperation	16.0 (n= 8)
4.	Changes in Law	4.0 (n= 2)
5.	Development of Manuals, Guidelines, etc.	4.0 (n= 2)
6.	Other	8.0 (n= 4)

*Multiple responses were allowed.

TABLE B-40: LRE POLICY STATMENT BY DEFINITION OF OPTIONS.

Policy Statement	Definition of Options: Same as the Law	Beyond the Law	Different from the Law	No Definition	TOTAL
1. Same as the Law	4.0 (n= 2)	20.0 (n=10)	16.0 (n= 8)	18.0 (n= 9)	58.0 (N=29)
2. Beyond the Law	8.0 (n= 4)	2.0 (n= 1)	4.0 (n= 2)	2.0 (n= 1)	16.0 (N= 8)
3. Alluded to	-	-	-	4.0 (n= 2)	4.0 (N= 2)
4. Indirectly Related	-	-	-	2.0 (n= 1)	2.0 (N= 1)
5. No Statement Cited	6.0 (n= 3)	8.0 (n= 4)	4.0 (n= 2)	2.0 (n= 1)	20.0 (N=10)
TOTAL	18.0 (N= 9)	30.0 (N=15)	24.0 (N=12)	28.0 (N=14)	100.0 (N=50)

TABLE B-41: EVALUATION OF PLACEMENT DECISIONS BY POLICY STATEMENTS

Evaluation of Placement Decisions	Policy Statements: Same as the Law	Beyond the Law	Alluded to	Indirectly Related	No Policy Statement	TOTAL
1. No Evaluation Required	48.0 (n=24)	12.0 (n= 6)	2.0 (n= 1)	2.0 (n= 1)	14.0 (n= 7)	78.0 (N=39)
2. Evaluation	8.0 (n= 4)	4.0 (n= 2)	2.0 (n= 1)	—	4.0 (n= 2)	18.0 (N= 9)
Frequency						
• More than once/year	2.0 (n= 1)	—	—	—	—	2.0 (N= 1)
• Once per year	2.0 (n= 1)	2.0 (n= 1)	—	—	4.0 (n= 2)	8.0 (N= 4)
• Less than once/year	—	—	—	—	—	0.0
• Unspecified	4.0 (n= 2)	2.0 (n= 1)	2.0 (n= 1)	—	—	8.0 (N= 4)
Responsible Party						
• Teacher	—	—	—	—	—	0.0
• Specialized Representative	—	—	—	—	—	0.0
• Evaluation Team	2.0 (n= 1)	2.0 (n= 1)	—	—	2.0 (n= 1)	6.0 (N= 3)
• Principal	—	—	—	—	—	0.0
• Unspecified	6.0 (n= 3)	2.0 (n= 1)	2.0 (n= 1)	—	2.0 (n= 1)	12.0 (N= 6)
3. Unclear/Other	2.0 (n= 1)	—	—	—	2.0 (n= 1)	4.0 (N= 2)
Frequency						
• Once/year	2.0 (n= 1)	—	—	—	2.0 (n= 1)	4.0 (N= 2)
Responsible Party						
• Evaluation Team	2.0 (n= 1)	—	—	—	—	2.0 (N= 1)
• Other	—	—	—	—	2.0 (n= 1)	2.0 (N= 1)
TOTAL	58.0 (N=29)	16.0 (N= 8)	4.0 (N= 2)	2.0 (N= 1)	20.0 (N=10)	100.0 (N=50)

TABLE B-42: EVALUATION OF PLACEMENT DECISIONS X DEFINITIONS OF LRE.

Evaluation of Placement Decisions	Definition of LRE: % of time in Mainstream 1a	Normalization 1c	Mainstreaming 1e	Not Appropriate Placement 1i	Other 1j	No Definition 2	Criteria[1] Totals	State Totals
1. No Evaluation equired	—	4.0 (n= 2)	20.0 (n=10)	4.0 (n= 2)	12.0 (n= 6)	48.0 (n=24)	88.0 (N 44)	78.0 (N=39)
2. Evaluation Required	2.0 (n- 1)	4.0 (n= 2)	2.0 (n= 1)	4.0 (n= 2)	—	10.0 (n= 5)	22.0 (N=11)	18.0 (N= 9)
Frequency								
• More than once/year	—	2.0 (n= 1)	—	—	—	—	2.0 (N= 1)	2.0 (N= 1)
• Once per year	2.0 (n= 1)	2.0 (n= 1)	—	4.0 (n= 2)	—	4.0 (n= 2)	12.0 (N= 6)	8.0 (N= 4)
• Less than once/year	—	—	—	—	—	—	---	---
• Unspecified	—	—	2.0 (n= 1)	—	—	6.0 (n= 3)	8.0 (N= 4)	8.0 (N= 4)
Responsible Party								
• Teacher	—	—	—	—	—	—	---	---
• Specialized Representative	—	—	—	—	—	—	---	—
• Evaluation Team	2.0 (n= 1)	—	2.0 (n= 1)	2.0 (n= 1)	—	2.0 (n= 1)	8.0 (N= 4)	6.0 (N= 3)
• Principal	—	—	—	—	—	—	--	—
• Unspecified	—	4.0 (n= 2)	—	2.0 (n= 1)	—	8.0 (n= 4)	14.0 (N= 7)	12.0 (N= 6)
3. Unclear/Other	—	—	2.0 (n= 1)	—	—	2.0 (n= 1)	4.0 (N= 2)	4.0 (N= 2)
Frequency								
• Once/year	—	—	2.0 (n= 1)	—	—	2.0 (n= 1)	4.0 (N= 2)	4.0 (N= 2)
Responsible Party								
• Evaluation	—	—	—	—	—	2.0 (n= 1)	2.0 (N= 1)	2.0 (N= 1)
• Other	—	—	2.0 (n= 1)	—	—	—	2.0 (N= 1)	2.0 (N= 1)
CRITERIA TOTALS[1]	2.0 (N= 1)	8.0 (N= 4)	24.0 (N=12)	8.0 (N= 4)	12.0 (N= 6)	60.0 (N=30)		100.0 (N=50)
STATE TOTALS		40.0 (N=20)				60.0 (N=30)		

[1] Criteria totals do not equal State totals because multiple responses were allowed.

TABLE B-43: POLICY STATEMENT X PROHIBITED CRITERIA.

Policy Statement	Prohibited Criteria: Specified	Prohibited Criteria: No Mention
1. Same as the Law	16.0 (n= 8)	42.0 (n=21)
2. Beyond the Law	4.0 (n= 2)	12.0 (n= 6)
3. Different from the Law	-	4.0 (n= 2)
4. Alluded to, not Cited	-	2.0 (n= 1)
5. No Statement Cited	6.0 (n= 3)	14.0 (n= 7)
TOTAL	26.0 (N=13)	74.0 (N=37)

TABLE B-44: POLICY STATEMENTS X MENTION OF SAFEGUARDS.[1/]

Policy Statements	No Single Test	Native Language	Non-Discriminetory	Not Solely Intelligence	Other Than Achievement	No Mention
1. Same as the Law	48.0 (n=24)	50.0 (n=25)	50.0 (n=25)	38.0 (n=19)	30.0 (n=15)	2.0 (n= 1)
2. Beyond the Law	12.0 (n= 6)	14.0 (n= 7)	14.0 (n= 7)	12.0 (n= 6)	8.0 (n= 4)	-
3. Different From the Law	4.0 (n= 2)	4.0 (n= 2)	4.0 (n= 2)	2.0 (n= 1)	2.0 (n= 1)	-
4. Alluded to, Not Cited	2.0 (n= 1)	2.0 (n= 1)	2.0 (n= 1)	2.0 (n= 1)	-	-
5. No Statement Cited	16.0 (n= 8)	20.0 (n=10)	14.0 (n= 7)	16.0 (n= 8)	12.0 (n= 6)	-
TOTALS	82.0 (N=41)	90.0 (N=45)	84.0 (N=42)	70.0 (N=35)	59.0 (N=26)	2.0 (N= 1)

[1/] Percentages refer to percent of states with N=50. Multiple responses were allowed.

TABLE B-45: POLICY STATEMENTS X NOTIFICATION PROCEDURES.[1/]

Policy Statements	Notification Procedures For Parents	For Others	Pre-Meeting materials
1. Same as the Law	58.0 (n=29)	0.0 (n= 0)	0.0 (n= 0)
2. Beyond the Law	16.0 (n= 8)	0.0 (n= 0)	0.0 (n= 0)
3. Different From the Law	4.0 (n= 2)	0.0 (n= 0)	0.0 (n= 0)
4. Alluded to, Not Cited	2.0 (n= 1)	0.0 (n= 0)	0.0 (n= 0)
5. No Statement Cited	20.0 (n=10)	0.0 (n= 0)	4.0 (n= 2)
TOTAL	100.0 (N=50)	0.0 (N= 0)	4.0 (N= 2)

[1/] All percentages refer to percent of states with N=50.

TABLE B-46: DEFINITION OF LRE X CRITERIA TO DETERMINE LRE.

Criteria	Definition: % of Time In Mainstream	Normalization	Mainstreaming	Most Appropriate Placement	Other	No Definition
1. % of time in Mainstream	___	___	6.0 (n= 3)	___	2.0 (n= 1)	2.0 (n= 1)
2. Fewest Limitations	___	2.0 (n= 1)	___	___	___	___
3. Normalization	___	___	___	___	___	2.0 (n= 1)
4. Proximity	___	___	4.0 (n= 2)	___	2.0	___
5. Other	___	2.0 (n= 1)	12.0 (n= 6)	___	10.0 (n= 5)	2.0 (n= 1)
6. No Mention	2.0 (n= 1)	4.0 (n= 2)	10.0 (n= 5)	8.0 (n= 4)	2.0 (n= 1)	56.0 (n=26)
CRITERIA TOTALS[1/]	2.0 (N= 1)	8.0 (N= 4)	32.0 (N=18)	8.0 (N= 4)	16.0 (N= 8)	62.0 (N=31)
STATE TOTALS	2.0 (N= 1)	8.0 (N= 4)	24.0 (N=12)	8.0 (N= 4)	12.0 (N= 6)	60.0 (N=30)

1/ Criteria totals do not equal State totals because multiple responses were allowed for each state.

TABLE B-47: AVAILABLE OPTIONS X PROVISION OF CONTINUUM. [1/]

Available Option	Provision of Continuum: Generally Advocated	Specifically Advocated	Not Mentioned
1. Regular Class - indirect	14.0 (n= 7)	20.0 (n=10)	2.0 (n= 1)
2. Regular Class- direct	16.0 (n= 8)	22.0 (n=11)	2.0 (n= 1)
3. Regular Class- Resource Room	14.0 (n= 7)	24.0 (n=12)	2.0 (n= 1)
GROUPED DATA	18.0 (n= 9)	34.0 (n=17)	2.0 (n= 1)
4. Self-Contained - part time	16.0 (n= 8)	24.0 (n=12)	-
5. Self-Contained- full time/regular school	16.0 (n= 8)	26.0 (n=13)	2.0 (n= 1)
6. Self-Contained- full time/special school	16.0 (n= 8)	26.0 (n=13)	-
GROUPED DATA	18.0 (n= 9)	34.0 (n=17)	2.0 (n= 1)
7. Private Day School	16.0 (n= 8)	20.0 (n=10)	2.0 (n= 1)
8. Public Residential	18.0 (n= 9)	24.0 (n=12)	2.0 (n= 1)
9. Private Residential	12.0 (n= 6)	18.0 (n= 9)	2.0 (n= 1)
GROUPED DATA	12.0 (n= 6)	34.0 (n=17)	2.0 (n= 1)
10. Hospital	14.0 (n= 7)	20.0 (n=10)	2.0 (n= 1)
11. Home Bound	16.0 (n= 8)	24.0 (n=12)	2.0 (n= 1)
GROUPED DATA	16.0 (n= 8)	32.0 (n=16)	2.0 (n= 1)
12. Cascade System	-	2.0 (n= 1)	-
13. Extended Diagnostic Placement	4.0 (n= 2)	2.0 (n= 1)	-
14. Other	10.0 (n= 5)	12.0 (n= 6)	-

[1/] Percentages represent percent of states. Multiple responses were allowed.

TABLE B-48: AVAILABLE OPTIONS BY PREFERENCE FOR REGULAR PLACEMENT

Available Options	Preference For Regular Placement		
	Generally Advocated	Specifically Advocated	Not Mentioned
1. Regular Class - indirect	20.0 (n=10)	10.0 (n= 5)	6.0 (n= 3)
2. Regular Class - direct	22.0 (n=11)	12.0 (n= 6)	6.0 (n= 3)
3. Regular Class - Resource Room	20.0 (n=10)	12.0 (n= 6)	8.0 (n= 4)
GROUPED DATA	30.0 (n=15)	18.0 (n= 9)	6.0 (n= 3)
4. Self-Contained - part-time	22.0 (n=11)	14.0 (n= 7)	8.0 (n= 4)
5. Self-Contained-Full time/Regular School	22.0 (n=11)	14.0 (n= 7)	8.0 (n= 4)
6. Self-Contained-Full time/Special School	22.0 (n=11)	12.0 (n= 6)	8.0 (n= 4)
GROUPED DATA	30.0 (n=15)	18.0 (n= 9)	6.0 (n= 3)
7. Private Day School	24.0 (n=12)	10.0 (n= 5)	4.0 (n= 2)
8. Public Residential	24.0 (n=12)	12.0 (n= 6)	8.0 (n= 4)
9. Private Residential	18.0 (n= 9)	10.0 (n= 5)	4.0 (n= 2)
GROUPED DATA	22.0 (n=11)	20.0 (n=10)	6.0 (n= 3)
10. Hospital	20.0 (n=10)	12.0 (n= 6)	4.0 (n= 2)
11. Home Bound	20.0 (n=10)	12.0 (n= 6)	8.0 (n= 4)
GROUPED DATA	26.0 (n=13)	18.0 (n= 9)	6.0 (n= 3)
12. Cascade System	2.0 (n= 1)	—	—
13. Extended Diagnostic	4.0 (n= 2)	2.0 (n= 1)	—
14. Other	16.0 (n= 8)	6.0 (n= 3)	—

1/ Percentages represent percent of states. Multiple responses were allowed.

TABLE B-49: AVAILABILITY OF INFORMATION FOR PARENTS X PARENT PARTICIPATION IN PLACEMENT MEETINGS.[1/]

Percent Information	Parent Participation: Attendance Required	Attendance Not Required	Attendance Policy Unclear	Not Mentioned
1. Their Rights	12.0 (n= 6)	40.0 (n=20)	26.0 (n=13)	22.0 (n=11)
2. Results	12.0 (n= 6)	38.0 (n=19)	26.0 (n= 13)	16.0 (n= 8)
3. Due Process Proceedings	12.0 (n= 6)	40.0 (n=20)	26.0 (n=13)	22.0 (n=11)
4. List of Options	10.0 (n= 5)	28.0 (n=14)	18.0 (n= 9)	14.0 (n= 7)
5. Other	10.0 (n= 5)	28.0 (n=14)	24.0 (n=12)	16.0 (n= 8)

1/ Percentages represent percent of states. Multiple responses were allowed for parent information.

TABLE B-50: FOCUS OF STATE MONITORING X POLICY STATEMENTS.[1/]

Focus	Policy Statement: Same as the Law	Beyond the Law	Different from the Law	Alluded to, Not Cited	Not Mentioned
1. Assessment Data	34.0 (n=17)	4.0 (n= 2)	——	——	16.0 (n= 8)
2. Placement	50.0 (n=25)	10.0 (n= 5)	2.0 (n= 1)	2.0 (n= 1)	18.0 (n= 9)
3. Meeting Participants	6.0 (n= 3)	4.0 (n= 2)	——	——	2.0 (n= 1)
4. Options	30.0 (n=15)	6.0 (n= 3)	——	——	12.0 (n= 6)
5. Evaluation Procedures	22.0 (n=11)	6.0 (n= 3)	——	——	16.0 (n= 8)
6. Documentation	22.0 (n=11)	6.0 (n= 3)	——	——	16.0 (n= 8)
7. Not Mentioned	2.0 (n= 1)	4.0 (n= 2)	2.0 (n= 1)	——	2.0 (n= 1)

[1/] Percentages represent percent of states. Multiple responses were allowed in Focus of State Monitoring category.

EXHIBIT B-1: SAMPLE FLOW CHARTS OF THE PLACEMENT PROCESS.

Flow Chart from Georgia

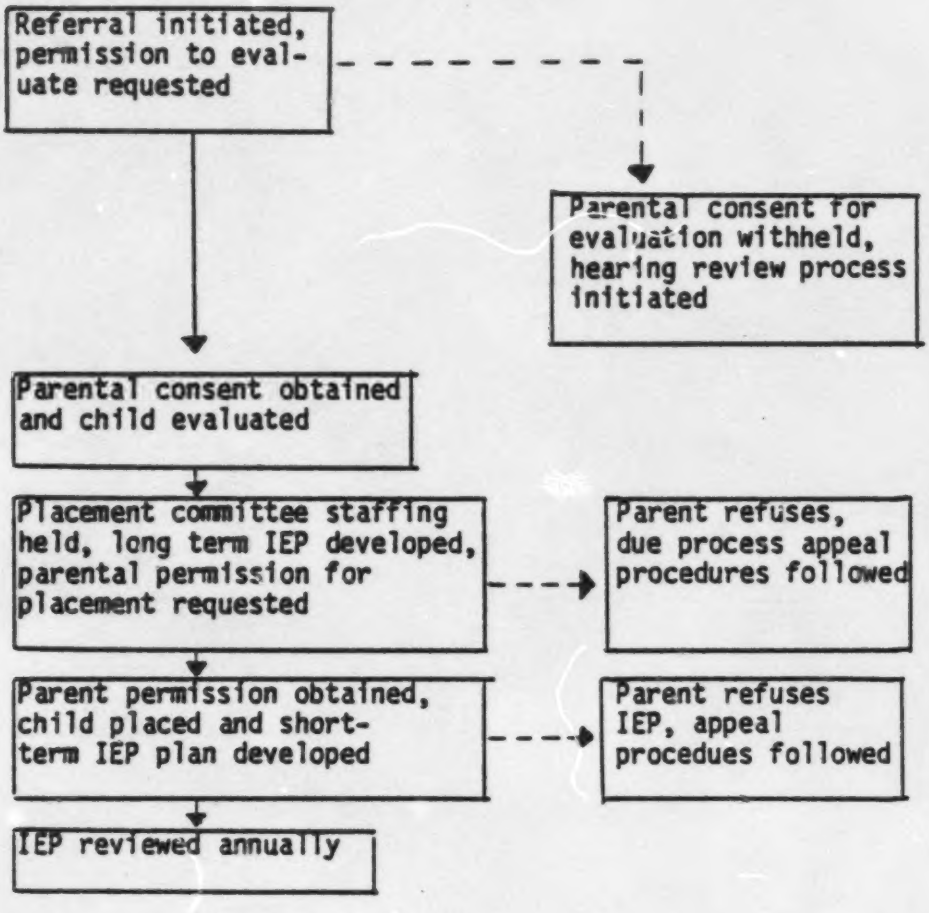
Referral initiated, permission to evaluate requested
Parental consent for evaluation withheld, hearing review process initiated
Parental consent obtained and child evaluated
Placement committee staffing held, long term IEP developed, parental permission for placement requested
Parent refuses, due process appeal procedures followed
Parent permission obtained, child placed and short-term IEP plan developed
Parent refuses IEP, appeal procedues followed
IEP reviewed annually

EXHIBIT B-1: SAMPLE FLOW CHARTS OF THE PLACEMENT PROCESS.

Flow Chart from Michigan

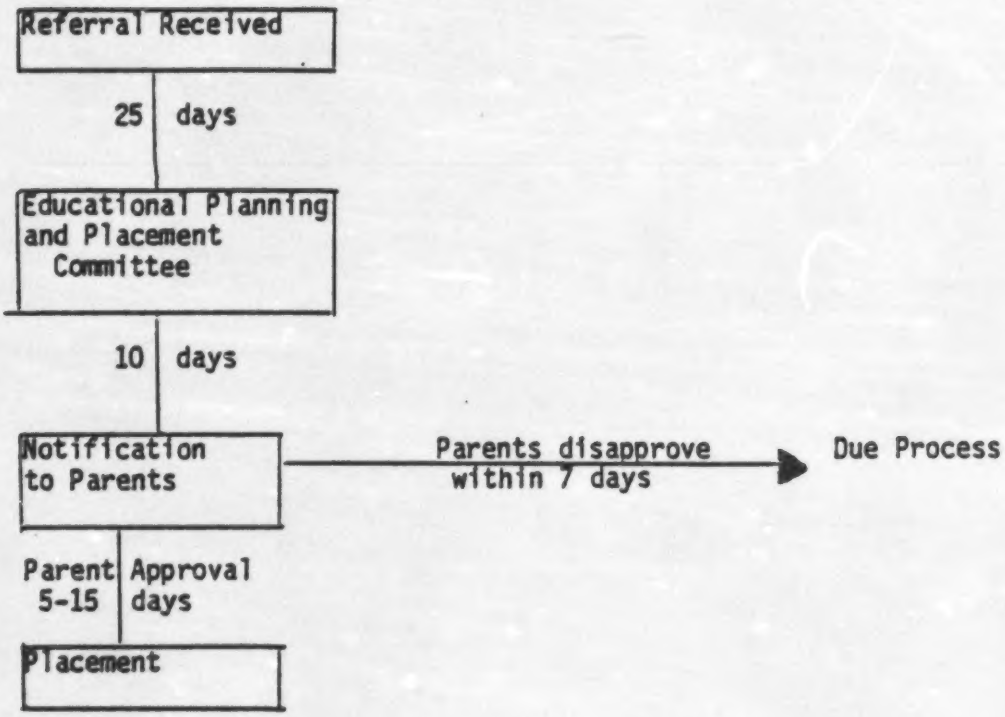

EXHIBIT B-2: CASCADE OF PLACEMENT OPTIONS (MISSOURI).

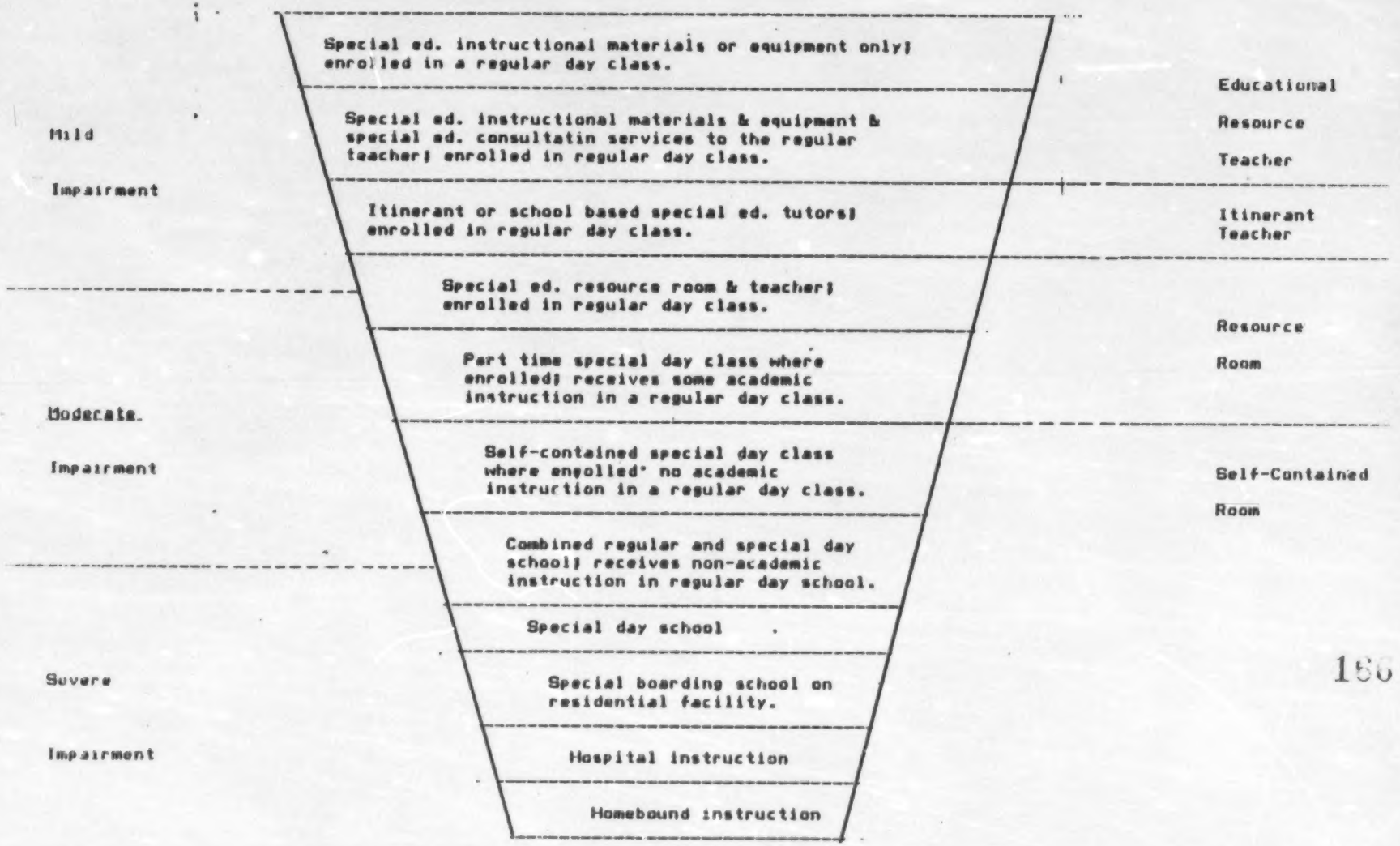
Special ed. instructional materials or equipment only; enrolled in a regular day class.
Special ed. instructional materials & equipment & special ed. consultatin services to the regular teacher; enrolled in regular day class.
Itinerant or school based special ed. tutors; enrolled in regular day class.
Special ed. resource room & teacher; enrolled in regular day class.
Part time special day class where enrolled; receives some academic instruction in a regular day class.
Self-contained special day class where enrolled; no academic instruction in a regular day class.
Combined regular and special day school; receives non-academic instruction in regular day school.
Special day school
Special boarding school on residential facility.
Hospital instruction
Homebound instruction
Mild Impairment
Moderate Impairment
Severe Impairment
Educational Resource Teacher
Itinerant Teacher
Resource Room
Self-Contained Room

EXHIBIT B-3: RECOMMENDED ORDER OF CONSIDERATION OF PLACEMENT OPTIONS (ALABAMA).

Condition **	LRE Alternatives in Order of Consideration *							
	Regular Class -indirect	Regular Class -direct	Regular Class Resource Room	Self-Contained Part time	Self-Contained full time, regular school campus	Self-Contained full time day school	Public Residential School	Private Residential School
Specific Learning Disability		1	2	3				
Gifted and Talented	1	2	3					
Visually Handicapped	1	2	3	4	5	6	7	8
EMR		1	2	3	4			
TMR				1	2			
Severe/ Profoundly Multiply Handicapped					1	2 (public) 3 (private)	4	
Physically Handicapped	1	2	3	4	5			

1/ Preceding each list of options, was the following statement: "Although placement of an exceptional child involves reviewing the total spectrum of the LRE alternatives, it is recommended that the ARD Committee review the following alternatives first."

2/ Similar information for Deaf/Blind; Auditory Handicaps; Speech, Language and Related Hearing Impairments; and Emotionally Disturbed was not given.

EXHIBIT B-4: RECOMMENDED PLACEMENT OPTIONS BY HANDICAPPING CONDITION AND SEVERITY LEVEL (ARKANSAS).

Condition	Possible services Recommended: Itinerant Instruction	Resource Room	Special Class	Homebound/ Hospital
Emotionally Handicapped	MILD	MILD-MODERATE	SEVERE	requiring 24 hour behavior management & controls
Hearing Handicapped *	MILD	MILD-MODERATE	MODERATE-SEVERE (local or Arkansas School for the Deaf)	any student because of severity/ nature of condition
Specific learning Disability	MILD	MILD-MODERATE	MODERATE-SEVERE (minimum of 1/2 school day in special program)	
MR	MILD	MILD-MODERATE	MODERATE-SEVERE	
Multiple Handicap		MILD-MODERATE	SEVERE	
Physically Handicapped	MILD	MILD-MODERATE (health room with cot for rests)	SEVERE	
Speech/Language Impaired	MILD-MODERATE	MODERATE-SEVERE		
Visually Impaired	MILD	MILD-MODERATE	MODERATE-SEVERE (local or Arkansas School for the Blind)	

* Program selection not to be determined by degree of loss alone.

EXHIBIT B-5: SOUTH CAROLINA APP F, FY78, ATTACHMENT #3

LEARNING DISABILITIES

I. *Definition*

"Learning disabilities pupils means pupils with special learning disabilities who exhibit a disorder in one or more of the basic psychological processes involved in understanding or in using spoken or written language. These may be manifested in disorders of listening, thinking, talking, reading, writing, spelling or arithmetic. They include conditions which have been referred to as perceptual handicaps, brain injury, minimal brain dysfunction, dyslexia, developmental aphasia, etc. They do not include learning problems which are due primarily to visual, hearing, or motor handicaps, to mental retardation, emotional disturbance or to environmental disadvantage." (Article 4.1 of the 1972 Code of Laws of South Carolina, as amended.)

II. *Identification*

A. Criteria for Participation/Enrollment (Either Criteria I *or* Alternative Criteria II must be met for a candidate to participate in a learning disabilities program).

1. Criteria I (When WISC, WISC-R or WAIS is used)

Inclusion Factors:

a. Candidate must be of legal school age

b. Candidate must have a health screening, which would indicate there are no vision, hearing, or physical problems

c. Candidate must not score below −1 standard deviation (full scale and/or performance or verbal subscales) given by a psychologist/educational evaluator certificated by the South Carolina Department of Education

d. Candidate must possess an *identified* learning disability. Identification shall be based upon profile analysis of the individually administered intelligence scale (administered by a psychologist/educational evaluator certificated by the South Carolina Department of Education) in addition to consistent supportive findings gleaned from at least *two* other supplemental sources of the observed psychological dysfunction.

Atypical patterns of intratest scatter shall be considered significant if the candidate obtains an averaged scale score of eight or lower in one or more of the following areas of dysfunction: (1) visual; (2) auditory/language; and (3) haptic/sensory motor.

Specifically, to meet criteria for placement, a candidate must exhibit a dysfunction to the degree that the average of any three of the appropriate Wechsler sub-test scaled scores is eight or lower. The appropriate sub-test of the WISC-R, WISC and WAIS and the related areas of dysfunction are provided below:

Area of Dysfunction	*Appropriate Sub-Tests of WISC-R, WISC, WAIS*
Visual	Picture Completion, Picture Arrangement, Block Design, Object Assembly, Coding, Mazes
Auditory/Language	Information, Similarities, Digit Span, Comprehension, Vocabulary, Arithmetic
Haptic/Sensory Motor	Block Design, Coding, Object Assembly, Mazes

In the event that a deficit suggests a commonality between Visual and Haptic/Sensory Motor areas of dysfunction (and the examiner is unable to distinguish a specific suspected area of disability), it is suggested that the Southern California Sensory Integration Tests, the Hiskey-Nebraska, or other suitable multi-modal instrumentation be administered in full, thus supplanting batteries unique to each area. (Examiner must administer a minimum of two different instruments.)

EXHIBIT B-5: (continued)

Suspected Visual Dysfunction

If there is a suspected visual dysfunction, as evidenced by the intelligence scale, the hypothesis must be supported through the administration (to the degree indicated) of at least two of the instruments below. (This battery must be administered by a psychologist/evaluator certified by the South Carolina Department of Education.)

Elementary	*Middle - Secondary*
Illinois Test of Psycho-linguistic Abilities Visual reception Visual association Visual sequence memory Visual closure	Hiskey-Nebraska Test of Learning Aptitude Visual attention span Completion of drawings Picture analysis Spatial Reasoning
Frostig Developmental Test of Visual Perception (all)	Bender-Gestalt Test (all)
Bender-Gestalt Test (all)	Benton Visual Retention Test (all)
Meeting Street School Screening Test (all)	Graham-Kendall Memory for Designs (all)
Southern California Sensory Integration Tests Space Visualization Figure Ground Perception Position in Space Design Copying	Detroit Test of Learning Abilities (all)
Graham-Kendall Memory for Designs (all)	
Detroit Test of Learning Abilities (all)	

Suspected Auditory/Language Dysfunction

Auditory and language dysfunctions are difficult to differentiate on the WISC-R, WISC or WAIS as they are inter-related on this instrument. In those instances where an auditory/language dysfunction is suspected, then the examiner must administer the entire ITPA in order to discriminate between these two dysfunctions. Additional testing required for other dysfunctions will not be required in this area as the ITPA will supplant the additional suggested instruments. If the examinee is beyond the chronological age for which the ITPA has been validated, then the examiner may use the Hiskey-Nebraska or other suitable instrument(s). When determination has been made as to the dysfunction (Language or Auditory), these areas shall be treated as separate components of "learning disabilities" for purposes of program entry, instruction and dismissal.

Suspected Haptic/Sensory Motor Dysfunction

If there is a suspected haptic/sensory motor dysfunction, as evidenced by the intelligence scale, the hypothesis must be supported through the administration (to the degree indicated) of at least two of the instruments below. (This battery must be administered by a psychologist/evaluator certified by the South Carolina Department of Education.)

EXHIBIT B-5: (continued)

Elementary	*Middle - Secondary*
McCarthy Scales of Children's Abilities Block Building Puzzle Solving Right-left orientation Draw a design Draw a child	Hiskey-Nebraska Test of Learning Aptitude Block patterns Puzzle blocks
Bender-Gestalt Test (all)	Bender-Gestalt Test (all)
The Purdue Perceptual Motor Survey (all)	Draw A Man (all)
Draw A Man (all)	Oseretsky Tests of Motor Proficiency (all)
Southern California Sensory Integration Tests (all)	Detroit Test of Learning Abilities (all)
Detroit Test of Learning Abilities (all)	

e. A candidate must fall below the 50th percentile in one or more of the following areas as measured by an individually administered standardized achievement test administered by a classroom teacher, special education teacher, guidance counselor, or other qualified school personnel. Areas include: Reading, Writing, Arithmetic, Spelling. One of the following instruments is suggested:

Elementary	*Middle - Secondary*
Wide Range Achievement Test (WRAT)	Wide Range Achievement Test (WRAT)
Peabody Individual Achievement Test	Peabody Individual Achievement Test
California Achievement Test	California Achievement Test
Metropolitan Achievement Test	Metropolitan Achievement Test
California Test of Basic Skills	California Test of Basic Skills
Iowa Test of Basic Skills	Iowa Test of Basic Skills

2. Alternative Criteria II (When Binet-Form LM is used)

Inclusion Factors:

a. Candidate must be of legal school age

b. Candidate must have a health screening, which would indicate there are no vision, hearing, or physical problems

c. Candidate must not score below −2 standard deviations (full scale) on an individually administered intelligence test given by a psychologist/education evaluator certificated by the South Carolina Department of Education

d. Candidate must possess an identified learning disability. Identification shall be based upon profile analysis of the individually administered intelligence scale (administered by a psychologist/educational evaluator certificated by the South Carolina Department of Education) in addition to consistent supportive findings gleaned from at least *two* other supplemental sources of the observed psychological dysfunction.

If the Stanford-Binet (Form LM) is utilized as the instrument of choice for placement, profile analysis must suggest deficit areas such that the developmental index (DI) obtained by the candidate in the specific areas of dysfunction (Visual, Auditory/Language, Haptic/Sensory Motor) is at least one year below the candidate's chronological age (CA). The appropriate developmental levels corresponding to the areas of dysfunction are given below:

EXHIBIT B-5: (continued)

TABLE I

AREAS OF DYSFUNCTION	Appropriate Binet Items for Computation of Developmental Index																			
	Year	2	2½	3	3½	4	4½	5	6	7	8	9	10	11	12	13	14	AA	SAI	SAII	SAIII
VISUAL		2 3 5 A	1 2 3 4 6	2 4	1 2 3 A	1 2 4 5	1 3 A	1 2 4 5 6A	3	1		1 3	2	1	3 6 A	1 5 6 A	2	4 A	3	A	
Month's Credit for each item passed		2	1.2	3	2	1.5	3	1.2	12	12	12	6	12	12	6	4	12	18	24	30	36
AUDITORY/ LANGUAGE		3 5 6 A	1 2 3 4 5 6	2 4 A	4 6	1 2 3 4 6 A	2 4 5 6 A	3	1 2 4 5 A	2 4 5 6 A	1 2 3 4 5 6 A	2 4 5 6 A	1 3 4 5 6 A	2 3 4 5 6 A	1 2 4 5 6	2 3 4	1 3 4 5 6 A	1 2 3 4 5 6 7 8	1 2 3 4 5 6 A	1 2 3 4 5 6 A	1 2 3 4 5 6 A
Month's Credit for each item passed		2	1	3	3	1.2	1.5	6	3	3	2	3	2.4	2.4	2.4	4	2.4	2	4	5	6
HAPTIC/SENSORY MOTOR		1 4	A	1 3 5 6	2 5 A		5	1 2 4 6 A	6	3		1 3		1	A	6 A		A			
Month's Credit for each item passed		3	6	1.5	3	6	6	1.5	12	12	12	6	12	12	12	12	12	18	24	30	36

As illustrated in TABLE I, the Binet Tests are grouped into age levels extending from age two (2) to Superior Adult levels. It is assumed that the tests within each age level are approximately uniform in difficulty. Alternate tests (designated A) are provided to be used in place of a regular test if circumstances render an item inappropriate.

The developmental index is found by crediting a candidate with a basal age (where all items are passed in the particular area of dysfunction) and adding to that age further months of credit for every test passed beyond the basal level. The month's credit for each test item from age two (2) through Superior Adult III is provided in TABLE I. For each age level, the number of items passed is multiplied by the appropriate number of month's credit. The sum total of month's credit for all age levels passed equals the developmental index for the particular area of dysfunction.

For those age groups and area of dysfunction where no appropriate items are available, the candidate is allowed twelve months developmental credit for year 6-14; six months for years 2-5; and the mental age equivalent at the adult levels.

Consistent support for all suspected areas of dysfunction must be found through the administration (to the degree indicated) of a minimum of two supplemental instruments which relate to the observed psychological dysfunction. It is recognized that the Wechsler and Binet scales are designed to measure global intellectual effectiveness; thus, used alone, analysis of sub-test patterns and sub-scale scores is only moderately successful in identification of the learning disabled child.

Suspected Visual Dysfunction

If there is a suspected visual dysfunction, as evidenced by the intelligence scale, the hypothesis must be supported through the administration (to the degree indicated) of a least two of the instruments below. (This battery must be administered by a psychologist/evaluator certified by the South Carolina Department of Education.)

EXHIBIT B-5: (continued)

Elementary	*Middle - Secondary*
Illinois Test of Psycholinguistic Abilities Visual reception Visual association Visual sequence memory Visual closure	Hiskey-Nebraska Test of Learning Aptitude Visual attention span Completion of drawings Picture analysis Spatial Reasoning
Frostig Developmental Test of Visual Perception (all)	Bender-Gestalt Test (all)
Bender-Gestalt Test (all)	Benton Visual Retention Test (all)
Meeting Street School Screening Test (all)	Graham-Kendall Memory for Designs (all)
Southern California Sensory Integration Test Space Visualization Figure Ground Perception Position in Space Design Copying	Detroit Test of Learning Abilities (all)
Graham-Kendall Memory for Designs (all)	
Detroit Test of Learning Abilities (all)	

Suspected Auditory/Language Dysfunction

Auditory and language dysfunctions are difficult to differentiate on the Stanford-Binet (Form LM) as they are inter-related on this instrument. In those instances where an auditory/language dysfunction is suspected, then the examiner must administer the entire ITPA in order to discriminate between these two dysfunctions. Additional testing required for other dysfunctions will not be required in this area as the ITPA will supplant the additional suggested instruments. If the examinee is beyond the chronological age for which the ITPA has been validated, then the examiner may use the Hiskey-Nebraska or other suitable instrument(s). When determination has been made as to the dysfunction (Language or Auditory), these areas shall be treated as separate components of "learning disabilities" for purposes of program entry, instruction and dismissal.

Suspected Haptic/Sensory Motor Dysfunction

If there is a suspected haptic/sensory motor dysfunction, as evidenced by the intelligence scale, the hypothesis must be supported through the administration (to the degree indicated) of at least two of the instruments below. (This battery must be administered by a psychologist/evaluator certified by the South Carolina Department of Education.)

EXHIBIT B-5: (continued)

Elementary	*Middle - Secondary*
McCarthy Scales of Children's Abilities Block Building Puzzle Solving Right-left orientation Draw a design Draw a child	Hiskey-Nebraska Test of Learning Aptitude Block patterns Puzzle blocks
Bender-Gestalt Test (all)	Bender-Gestalt Test (all)
The Purdue Perceptual-Motor Survey (all)	Draw A Man (all)
Draw A Man (all)	Oseretsky Tests of Motor Proficiency (all)
Southern California Sensory Integration Test (all)	Detriot Test of Learning Abilities (all)
Detroit Test of Learning Abilities (all)	

e. A candidate must fall below the 50th percentile in one or more of the following areas as measured by an individually administered standardized achievement test administered by a classroom teacher, special education teacher, guidance counselor, or other qualified school personnel. Areas include: Reading, Writing, Arithmetic, Spelling. One of the following instruments is suggested:

Elementary	*Middle - Secondary*
Wide Range Achievement Test (WRAT)	Wide Range Achievement Test (WRAT)
Peabody Individual Achievement Test	Peabody Individual Achievement Test
California Achievement Test	California Achievement Test
Metropolitan Achievement Test	Metropolitan Achievement Test
Iowa Test of Basic Skills	California Test of Basic Skills
	Iowa Test of Basic Skills

Exclusion Factors:

The following are specific exclusion factors which make a candidate ineligible for placement in a learning disabilities program:

a. Mental Retardation—A score below –2 standard deviations on an individual test of intelligence. (Wechsler or Binet)

b. Deaf or Hard of Hearing—More than 30 db loss in the better ear unaided, and speech and language learned through normal channels.

c. Blind or Partially Sighted—A visual acuity of less that 20/70 in the better eye.

d. Physical Handicap—Evidence of physical handicap directly related to the child's deficit area.

e. Emotional Disturbance—Evidence of a primary emotional disturbance severe enough to necessitate a therapeutic, affective instructional program.

f. Environmental Disadvantage—Evidence of environmental disadvantage from behavioral observation and biographical data.

g. Slow Learner—Evidence of consistent sub-normal performance of at least −1 standard deviation on tests of intelligence. (WISC, WIPPSI, WISC-R or Stanford-Binet, Form LM)

B. Requirements for Re-evaluation:

All pupils enrolled in learning disabilities programs at the elementary level (grades 1-6) shall be re-evaluated every two years. This re-evaluation shall include either Criteria I or Alternative Criteria II required in Section II-A letters "d" and "e" of this document. All pupils enrolled in learning disabilities programs at the middle or secondary level (grades 7-12) shall be re-evaluated every two years. This re-evaluation shall include the Criteria I or Alternative Criteria II required in Section II-A letters "d" and "e" of this document.

C. Criteria for Dismissal

Reasons for Dismissal:

1. Pupil exceeds legal school age, transfers, or withdraws from the public school program.

2. Parent/Surrogate, legal guardian or majority aged pupil submits written request that services be terminated (consistent with "Procedural Due Process").

3. Pupils must *either:*

   a. Demonstrate no evidence of a significant dysfunction in the areas of visual, auditory, language or haptic/sensory motor as measured by intellectual and supportive instruments administered by the psychologist or educational evaluator. (This specific decision shall be judgmental on the part of the psychologist/educational evaluator.)

   OR

   a. Pupils must score above the 50th percentile in all of the following areas as measured by an individual achievement test administered by a classroom teacher, special education teacher, guidance counselor or other qualified school personnel. Academic areas include: Reading, Writing, Arithmetic and Spelling.

The superintendent or his designee must verify by signature any changes in placement and/or dismissal of pupils.

D. Program Models — Recommended

Public Law 93-380 evokes the concept of "least restrictive educational setting" for handicapped children. Consequently, South Carolina statutes provide for three "program models" for handicapped children, e.g.:

1. Itinerant—Taught in a regular class setting with some specialized instruction.

2. Resource Room—Pupil spends a portion of his instructional time in a special class and the balance in a regular class.

3. Self-Contained—Full-time in a special class.

In determining the most appropriate program model for a learning disabled child, consideration must be given to both the number of *identified* dysfunctions and the severity of *specific* dysfunctions. For example, a child may meet the criteria in three areas of dysfunction and be mildly handicapped in each. This child would probably be served in a resource setting. Conversely, a child may be severely disabled in only one identified area and may be best served in a self-contained schema.

In summary, both the number of specified disabilities and the degree of each must be accorded careful consideration prior to determining the most effective program model. The decisions are, by necessity, judgmental based on the pupil's full evaluation.

III. *Placement*

No child shall be placed in programs for learning disabilities until the following process has been completed.

The child has been "staffed" by the district's staffing committee. The staffing committee shall include, but not be limited to, the following:

a. Psychologist
b. Person obtaining the child's social history
c. Person presenting the child's medical records
d. Member of the district's administrative staff

Additional persons may include the principal, referring teacher, speech clinicians, school nurse, guidance counselors, or others who may be able to offer pertinent information relative to the child. The child's parent/surrogate *must* be invited to the staffing conference. Final responsibility for determining the child's eligibility for participation in the district's program for handicapped children shall be either the district superintendent or his *specific* designee.

Prior to final placement, individually sequenced instructional objectives must be developed for each pupil and kept on file by the special teacher receiving the child.

IV. *Record Keeping*

A. Complete diagnostic information, including evidence that "Procedural Due Process" has been fully accorded the child, shall be housed in one central depository whose site shall be determined by the district superintendent.

B. The principal of each facility where special instructional programs are provided shall maintain a complete placement form for each handicapped child enrolled in any special program in that school. (See attached Placement Form — note these are categorical.)

C. Each teacher/clinician providing special education instruction shall maintain specific instructional objectives for each pupil he serves. These objectives must be updated at least twice each academic year.

D. Each teacher shall annually review the pupil's records to insure that current information is being maintained.